

Epting & Rannik, LLC

46A State Street,
Charleston, SC 29401-
Tel: 843-377-1871 Fax: 843-377-1310
ake@epting-law.com

Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: Aug 25, 2022

Invoice Num: 1522

Billing Through: Jul 31, 2022

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

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REDACTED

5/11/2022	Finalize and file Amended Complaint and Motion to Quash; Email to AUSA regarding Motion; Email Client regarding filings, press; Confer with AGG regarding Service	JGR	1.80	\$513.00
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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
5/12/2022	Email recent news article to Briggs and Littzi regarding filing of USDC suit	RHM	0.20	\$35.00
	REDACTED			
5/13/2022	Review counsel correspondence regarding service; Confer with JGR regarding media and malpractice	AKE	1.10	\$605.00
	REDACTED			
5/16/2022	Receive and index Waiver of Service from Palmetto State Bank; Prepare Notice of Filing and Efile; Review Waiver of Service of Summons on behalf of Fleming and Moss & Kuhn; Emails to/from Jordan with Acceptance of Service	AGG	0.50	\$75.00
5/16/2022	Telephone call with T. Pendarvis regarding Service and Coverage; Review Waivers of Service for Palmetto, Fleming, Moss & Kuhn	JGR	0.40	\$114.00
5/16/2022	Prepare Notice of Filing for Waiver of Service of Summons by Fleming, Moss & Kuhn; Eserve	AGG	0.20	\$30.00
	REDACTED			
5/17/2022	Email Jordan regarding Acceptance of Service for the Amended Pleadings	AGG	0.20	\$30.00
5/18/2022	Review Fitts article; Call to Solomons; Memo to Massalon	AKE	0.80	\$440.00
5/18/2022	Research reporting on Amended Pleading	JGR	0.20	\$57.00
	REDACTED			
5/19/2022	Executed Waiver by Westendorf and Efile Provide Briggs and Littzi recent article addressing USDC suit	RHM	0.20	\$35.00

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5/20/2022	Email to Solomons regarding meeting with AKE	RHM	0.20	\$35.00

REDACTED

6/7/2022	Review and respond to Email to Pendarvis regarding Wavier of Service of Summons	AGG	0.20	\$30.00
6/7/2022	Research and Email recent news articles regarding Murdaugh developments to Client	RHM	0.30	\$52.50

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
6/14/2022	Prepare strategy for Motion to Stay and Opposition	AKE	0.30	\$165.00
6/14/2022	Research regarding Motion to Stay Civil Proceeding in favor of parallel criminal proceeding	JGR	1.20	\$342.00
6/16/2022	Telephone call with Howe; Confer regarding Motion; Response and Research	AKE	1.60	\$880.00
6/16/2022	Research and begin draft of Opposition to Motion to Stay; Confer with AKE same; Emails with Limehouse regarding Production to ODC	JGR	5.60	\$1,596.00
6/17/2022	Review, research and revise Opposition; Memo to client	AKE	2.80	\$1,540.00
6/17/2022	Revise Opposition to Motion to Stay; Research; Email to Briggs regarding same; Email Griffin regarding privilege claims	JGR	4.60	\$1,311.00
6/21/2022	Receive and Index Memo by Fleming in Support of Motion to Stay; Research Windland Order on Motion to Stay	AGG	0.30	\$45.00
REDACTED				
6/21/2022	Revise Opposition to Motion; Call with Briggs regarding same; Research regarding Opposition Motion	JGR	4.40	\$1,254.00
6/21/2022	Research and revise Opposition to Motion to Stay; Call with Briggs	JGR	4.00	\$1,140.00
REDACTED				
6/22/2022	Finalize and file Opposition to Motion to Stay; Call with Briggs	JGR	5.00	\$1,425.00
6/23/2022	Revisions to and finalize report to Briggs per AKE regarding Motion to Stay status	RHM	0.20	\$35.00

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Date	Description	Employee	Hours	Amount
6/23/2022	Review and file Notice of Request for Protection from Gressette; Receive and index Order Denying Murdaugh and Fleming Motions to Stay	AGG	0.20	\$30.00
6/23/2022	Review Court Order; Memo to Briggs; Call with Briggs; Confer with JGR	AKE	1.20	\$660.00
6/23/2022	Review Judge Gergel Order Denying Motion to Stay; Emails and call with client regarding ruling	JGR	0.60	\$171.00
6/23/2022	Review Court Order denying Murdaugh and Fleming Motions to Stay	CTM	0.20	\$57.00

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	REDACTED			
7/1/2022	Receive and calendar Scheduling Order	AGG	0.20	\$30.00
	REDACTED			
7/6/2022	Review Case Law on Conspiracy	AKE	0.40	\$220.00
	REDACTED			
7/7/2022	Conference with AKE regarding revisions to Opposition; Send to A. Moccio; Finalize and file;	JGR	3.80	\$1,083.00
7/7/2022	Research regarding Conspiracy and Aiding and Abetting			
7/7/2022	Research regarding potential claims to incorporate into Amended Complaint	CTM	0.20	\$57.00
7/8/2022	Review Research on Conspiracy and develop strategy; Confer regarding Westendorf	AKE	0.80	\$440.00
7/8/2022	Conference with AKE regarding next steps; Research Conspiracy Cause of Action	JGR	0.60	\$171.00
7/8/2022	Conference with co-counsel to discuss strategy for establishing Conspirator Defendants' Liability	CTM	0.20	\$57.00
7/11/2022	Circulate link and track responses for Rule 26f Conference; Telephone calls with Griffin office	AGG	0.30	\$45.00
7/11/2022	Review Motions to Dismiss from Fleming, M&K; Research same; Begin outlining Opposition	JGR	1.20	\$342.00
7/11/2022	Research cases where SC Immunity over attorneys from Third-Party Claims does not apply	CTM	1.00	\$285.00
7/12/2022	Review article and Motions to Dismiss; Outline response	AKE	1.20	\$660.00
7/12/2022	Research and continue outlining Opposition; Research Aiding & Abetting Cause of Action	JGR	2.40	\$684.00

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	REDACTED			
7/13/2022	Research for Opposition to Motions to Dismiss; Emails with Hill regarding Consent; Call with Briggs regarding Motions of Laffitte, Murphy Grantland	JGR	2.60	\$741.00
7/13/2022	Draft supplemental content for outline of Opposition to Motions to Dismiss regarding Personal Interest and Summary Judgment sections	CTM	0.80	\$228.00
7/14/2022	Research and revise Opposition	JGR	1.40	\$399.00
	REDACTED			
	REDACTED			
7/18/2022	Draft Personal Interest and Summary Judgment portions of Opposition to Motions to Dismiss	CTM	5.00	\$1,425.00
	REDACTED			
7/19/2022	Research and draft revisions to Brief in Opposition to Fleming and M&K Motions; Begin drafting Second Amended Complaint; Research regarding same	JGR	4.00	\$1,140.00
7/19/2022	Continue drafting Personal Interest and Summary Judgment portions of Opposition to Motions to Dismiss	CTM	7.00	\$1,995.00
	REDACTED			

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7/20/2022	Research and revise draft Brief in Opposition to Fleming, M&K Motions; Revise 2nd Amended Complaint draft; Review Order in Subpoena matter and send materials to AUSA	JGR	5.40	\$1,539.00
7/20/2022	Continue drafting Personal Interest and Summary Judgment portions of Opposition to Motions to Dismiss; Supplement and revise other portions of Opposition Brief	CTM	7.50	\$2,137.50
7/20/2022	Review draft Second Amended Complaint and confer with co-counsel regarding supplementing same	CTM	0.30	\$85.50
7/21/2022	Review and revise 1st and 2nd versions of Brief in Opposition	AKE	2.80	\$1,540.00
7/21/2022	Revise Brief in Opposition to Fleming, M&K Motions; Draft letter to client regarding Murphy Grantland	JGR	3.40	\$969.00
7/21/2022	Conference with JGR regarding additional revisions needed for Opposition to Motions to Dismiss	CTM	0.30	\$85.50
REDACTED				
7/22/2022	Appear at 26(f) Conference; Confer with AKE and draft Motion for Leave to File Sur-reply; Revise Brief in Opposition to Fleming, M&K Motions, and send to client; Letter to Hill, Griffin regarding Motion to Dismiss; Send letter to client regarding Murphy Grantland	JGR	5.20	\$1,482.00
REDACTED				
7/25/2022	Receive and index Motion to File Sur Reply to Motion(40) to Dismiss; Confer with JGR and CTM regarding filing of Notice of Appearance	AGG	0.30	\$45.00
7/25/2022	Draft Rule 56 Affidavit; Finalize and file Opposition to Fleming, M&K Motions	JGR	2.40	\$684.00
7/25/2022	Revise Opposition to Motions to Dismiss, including citations, prior to filing; Review documents from underlying Probate matter identifying documents relevant to liability of co-Conspirator Defendants	CTM	3.70	\$1,054.50
7/26/2022	Receive and index Text Order regarding Motion to File Sur Reply to Motion to Dismiss	AGG	0.20	\$30.00
7/26/2022	Review correspondence from Court regarding filing of Notice of Appearance	CTM	0.10	\$28.50

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7/27/2022	Continue review of documents from underlying Probate matter identifying documents relevant to Liability of co-Conspirator Defendants; Review Joint Status Report and correspondence from co-Receiver's counsel, Court, and co-Counsel regarding same	CTM	1.70	\$484.50
7/28/2022	Receive and Index Joint Status Report	AGG	0.20	\$30.00
7/28/2022	Emails to/from Briggs to coordinate conference call with AKE, Briggs and Adam M.	AGG	0.20	\$30.00

REDACTED

For Professional Services Rendered:

224.70 \$76,981.50

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
4/22/2022	USDC Filing Fee - Summons and Complaint	\$402.00

REDACTED

Total Costs: \$451.00

Total Amount of this Bill: \$77,432.50

Previous Balance: \$0.00

Balance Due: **\$77,432.50**

This invoice is due on 9/24/2022

TIMEKEEPER SUMMARY

<u>Timekeeper</u>	<u>Total Hours</u>	<u>Hourly Rate</u>
Andrew Epting	57.0	\$550.00
Angela Goddard Gross	14.8	\$150.00
Clinton Magill	33.7	\$285.00
Jaon Rannik	117.7	\$285.00
Rhonda McCraw	1.5	\$175.00

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REDACTED				
8/1/2022	Review series of correspondence from Court regarding filing of Fleming Reply and Motion for Leave to File Surreply; Correspond with Co-Counsel regarding language to be included in Second Motion for Leave to File Surreply	CTM	0.60	\$171.00
8/2/2022	Receive and Index Reply to Response to Motion regarding Motion to Dismiss Response filed by Fleming; Review Text Order Granting Motion to file Surreply	AGG	0.20	\$30.00
8/2/2022	Review Order Granting Leave to File Surreply; Review Fleming Reply; Draft outline of Surreply and Research same	JGR	1.20	\$342.00
8/3/2022	Draft Amended Scheduling Order	AGG	0.20	\$30.00
8/3/2022	Draft 26(f) Report, Discovery Plan, Mediation Statement, proposed Scheduling Order, 26.03 Responses, and revise Surreply; Call with Amy Hill and memo regarding same	JGR	6.80	\$1,938.00
8/3/2022	Review draft 26(f) Report, 26(f) Discovery Plan, Mediation Statement, and proposed Consent Amended Scheduling Order and correspondence; Review correspondence regarding Palmetto State Bank comments to draft 26(f) Conference documents and Offer of Confession of Judgment from Murdaugh; Conference with AKE regarding liability of Fleming and Moss & Kuhn for failure to adhere to Settlement payment instructions	CTM	1.00	\$285.00
8/4/2022	Prepare for and attend call with client; Debrief with JGR and CTM; Call with RHM	AKE	1.40	\$770.00
8/4/2022	Email client regarding Privilege question; Revise 26(f) materials; Emails with counsel regarding same; Revise Surreply; Call with client	JGR	7.80	\$2,223.00
8/4/2022	Conference with AKE and JGR regarding Privilege issues and content of Client's Surreply; Review series of correspondence from conspirator Defendants' Counsel regarding discussing 26(f) topics; Call with Client and Co-Counsel regarding case updates and developments with Receivers' Counsel	CTM	1.10	\$313.50
8/5/2022	Review and revise Surreply	AKE	0.40	\$220.00
8/5/2022	Efile Surreply and Rule 26(f) materials; Conference with JGR and CTM; Receive and Index Rule 26.03 Answers to Interrogatories by various defendants	AGG	0.50	\$75.00

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8/5/2022	Finalize and file 26(f) materials; Emails regarding same; Finalize Surreply	JGR	2.40	\$684.00
8/5/2022	Review 26.03 Answers of Moss, Palmetto, Westendorff, Fleming, and Murdaugh; Review 26.01 Answers and Amended 26.03 Answers of Murdaugh; Review draft of Client's Surreply and 26.03 Answers prior to filing; Review series of correspondence from Court, Client and Counsel regarding Privilege, Surreply, and various 26(f) materials; Working session with co-Counsel finalizing Surreply and Rule 26(f) materials	CTM	2.10	\$598.50
8/8/2022	Review 26.01, 26.03, and 26(a)(1) Disclosures of parties to glean relevant information including witnesses and anticipated testimony for use in case planning	AGG	1.00	\$150.00
8/8/2022	Research Causes of Action; Review parties' 26(f) filings; Review medical records in claims file; Outline Discovery Requests	JGR	5.80	\$1,653.00
8/8/2022	Conference with JGR regarding potential Causes of Action to include in Second Amended Complaint; Issues identified in medical records within Claims File and Defendants' 26.03 and 26.01 Filings; Research viability of Money Had and Money Received Claim against Moss and Fleming Defendants; Review correspondence with Client and Counsel regarding privilege issues and from Court regarding correction to Palmetto 26.03 filings	CTM	1.90	\$541.50
REDACTED				
8/9/2022	Receive and index Moss & Kuhn Professional Liability Dec Page; Review and file Stipulation for Extension	AGG	0.30	\$45.00
8/9/2022	Review Moss & Kuhn Insurance Dec Page; Revise Discovery Requests	JGR	0.60	\$171.00
8/9/2022	Conference with JGR regarding privilege	AKE	0.60	\$330.00
8/9/2022	Research viability of potential Claim for Intentional Interference with Contractual Relations as to Insurance policy	CTM	0.20	\$57.00
8/10/2022	Revise Second Amended Complaint and send to client; Research same; Research RICO and memo regarding same; Revise Discovery Requests; Review Notices regarding Scheduling Order	JGR	5.00	\$1,425.00
8/10/2022	Review draft Amended Petition regarding potential new claims; Review Scheduling and Mediation Orders entered by Court and series of correspondence regarding same; Conference with JGR discussing Judge's changes to Scheduling Orders proposed by the Parties	CTM	0.60	\$171.00

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8/11/2022	Attend call with Briggs, Mocchiolo, AKE, CTM regarding Privilege; Review Scheduling Order and forward to clients; Continue Research into RICO and revise Second Amended Pleading	JGR	1.80	\$513.00
8/11/2022	Prepare for and attend call with Client and Co-Counsel regarding privilege issues; Review series of correspondence from Court regarding correcting Scheduling and Mediation Orders; Review underlying Mediation correspondence regarding potential attendance of Structured Settlement Representative	CTM	0.70	\$199.50
8/12/2022	Telephone call with counsel for Westendorf regarding Settlement Offer; Research and revise RICO Claim; Send draft 2nd Amended Pleading to client	JGR	4.60	\$1,311.00
8/12/2022	Review updated draft of Second Amended Complaint considering Additional Supplements	CTM	0.30	\$85.50
8/15/2022	Finalize and serve JGR letter serving Answers to Local Rule 26(a)(1) Initial Disclosures; Confer with JGR; Receive and index Westendorf's Rule 26(a)(1) Disclosures; Download documents	AGG	0.30	\$45.00
8/15/2022	Finalize 26(a)(1) Answers; Review Defendants' 26(a)(1) Answers	JGR	0.80	\$228.00
8/15/2022	Analyze Rule 26(a)(1) Initial Disclosures served by Defendants Palmetto State Bank, Fleming, and Westendorff; Brief initial review of Westendorf production for content	CTM	0.70	\$199.50
8/16/2022	Prepare Dropbox link with Westendorf Production; Conference with JGR	AGG	0.20	\$30.00
8/16/2022	Call with JGR regarding status of Discovery	AKE	0.20	\$110.00
8/16/2022	Draft Discovery Requests; Review Westendorf Production	JGR	2.60	\$741.00
8/16/2022	Review 26(a)(1) initial disclosures served by Co-Receiver; Attorney analysis considering potential Requests for Production to be served on Defendants; Potential conflicts of Co-Receiver's Counsel representation; strategy for utilizing Moss & Kuhn Trust misappropriation of funds to support conspiracy claim	CTM	0.50	\$142.50
8/17/2022	Review of prior news articles relating to Murdaugh history with Boulware and Moselle property to determine link to unraveling of various schemes	RHM	0.40	\$70.00
8/17/2022	Confer with JGR regarding Discovery	AKE	0.30	\$165.00
8/17/2022	Review proposed Discovery and notes regarding US Attorney and Indictment	AKE	0.80	\$440.00
8/17/2022	Revise Discovery Requests; Email client regarding same	JGR	0.60	\$171.00

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8/17/2022	Analyze superseding indictment of Murdaugh, Fleming, and Laffitte regarding considering allegations therein which could support RICO liability; Review article regarding Pinckney settlement with Defendants Palmetto and Murdaugh; Review series of correspondence regarding purported medical privilege over Defendant Westendorf's documents and client comments on draft Requests for Production to Defendants	CTM	0.80	\$228.00
REDACTED				
8/19/2022	Receive and index Rule 26(a)(1) Disclosures by Murdaugh; Prepare Nautilus Interrogatories and Request to Produce to Defendants; Finalize cover letter to all counsel and serve	AGG	1.00	\$150.00
8/19/2022	Finalize and serve Discovery Requests	JGR	0.80	\$228.00
8/19/2022	Attorney analysis considering potential Requests to Admit to Defendants	CTM	0.20	\$57.00
8/22/2022	Review series of correspondence from Counsel for Defendants Fleming and Westendorf re electronic service; Review series of correspondence from Counsel for various parties regarding discussing electronic service of discovery	CTM	0.20	\$57.00
8/23/2022	Review and file Orders Denying Motions to Dismiss	AGG	0.20	\$30.00
8/23/2022	Prepare letter to Grantland and memo to JGR	AKE	0.40	\$220.00
8/23/2022	Review Orders on Motions to Dismiss; Email Client	JGR	0.50	\$142.50
8/23/2022	Detailed analysis of Court Orders denying Co-Receiver's Motion to Dismiss or Stay and Denying Defendant Fleming and Moss & Kuhn Motion to Dismiss; Confer with co-Counsel regarding potential future utilization of Court's favorable holdings in Orders filed today; Review series of correspondence from Court, client, and co-counsel regarding today's Orders	CTM	1.00	\$285.00
8/24/2022	Conference with AKE discussing issues to target in Interrogatories to the Parties; Attorney analysis regarding potential supplemental discovery requests to serve based on information contained in parties' Initial 26.03 and 26(a)(1) Disclosures	CTM	0.60	\$171.00
8/24/2022	Review letter to Grantland	JGR	0.20	\$57.00
8/25/2022	Finalize and conform letter to J. Grantland regarding release of Nautilus file	RHM	0.20	\$35.00
8/25/2022	Send draft Grantland Email to client;	JGR	0.20	\$57.00

Epting & Rannik, LLC

46A State Street,

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ake@epting-law.com

Invoice Submitted To:

John Briggs
 Nautilus Insurance Group
 7233 East Butherus Drive
 Scottsdale, AZ 85260

Invoice

Invoice Date: Nov 16, 2022

Invoice Num: 1537

Billing Through: Oct 31, 2022

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
8/26/2022	Telephone call with J. Briggs regarding Grantland letter; Revise letter	JGR	0.40	\$114.00
8/26/2022	Review draft letter to Grantland and confer with co-Counsel regarding contents of same	CTM	0.20	\$57.00
8/29/2022	Review correspondence from client regarding approving proposed letter to Grantland	CTM	0.10	\$28.50
8/30/2022	Receive and Index Moss & Kuhn Answer to Amended Complaint	AGG	0.20	\$30.00
8/30/2022	Review filings and strategy	AKE	0.30	\$165.00
REDACTED				
9/1/2022	Review letters regarding file; Review Grantland response; Prepare letter to Seymour and call	AKE	0.80	\$440.00
9/2/2022	Serve Plaintiff's Discovery	AGG	0.20	\$30.00
9/2/2022	Review Fitnews site and download and circulate article regarding FBI charges against LaFitte to bolster RICO claims	RHM	0.30	\$52.50
REDACTED				
9/6/2022	Receive and Index Fleming Answer to Amended Complaint	AGG	0.20	\$30.00
REDACTED				
9/6/2022	Review Defendant Fleming Answer to Amended Complaint and correspondence from Court regarding filing of Answer	CTM	0.20	\$57.00
9/8/2022	Research liability for failing to hold settlement check in trust for adverse party; Confer with AKE regarding potential breach of contract claim against Defendant Moss & Kuhn and/or Fleming arising out of Murphy Grantland settlement letter	CTM	1.00	\$285.00
REDACTED				

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
	REDACTED			
9/14/2022	Review Defendant Fleming Responses to our Requests for Production; Confer with co-counsel regarding potential impact of Fifth Amendment assertion therein	CTM	0.20	\$57.00
	REDACTED			
9/16/2022	Initial review of Fleming Answers to Nautilus Interrogatories and Responses to Requests for Production per JGR and advise findings	RHM	0.20	\$35.00
9/16/2022	Review and file Fleming Responses to Nautilus 1st Interrogatories and Requests for Production	AGG	0.20	\$30.00
	REDACTED			

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Date	Description	Employee	Hours	Amount
10/4/2022	Draft subpoena to Murphy & Grantland and confer with AKE, CTM; Review Murphy & Grantland Production	JGR	1.40	\$399.00
10/4/2022	Confer with AKE and JGR regarding draft Subpoena to Murphy & Grantland and Gergel Order; Review summary of bank records; Conference with counsel for Defendant Palmetto State Bank; Review correspondence from Court regarding protections requests	CTM	0.70	\$199.50
10/5/2022	Draft and revise Subpoena language	AKE	1.30	\$715.00
10/5/2022	Review draft language for Subpoena to Murphy Grantland and consider supplemental language	CTM	0.20	\$57.00
10/6/2022	Revisions to draft Subpoena language and review of Murphy Grantland production for purposes of Subpoena language	RHM	0.60	\$105.00
10/6/2022	Revise Subpoena language; Email to CTM and JGR	AGG	0.50	\$75.00
10/6/2022	Review proposed revised language for Subpoena to Murphy Grantland and outline additional information to be addressed	CTM	0.30	\$85.50
10/7/2022	Review recent articles in FITSNews and Post & Courier publications and summarize per AKE; Finalize email to Briggs with articles per AKE	RHM	0.70	\$122.50
10/7/2022	Review news articles and finalize Subpoena; Letter to Client	AKE	0.80	\$440.00
10/7/2022	Finalize Subpoena; Draft and finalize cover letters to all counsel for Murphy & Grantland and serve	AGG	1.00	\$150.00
10/7/2022	Supplement and revise Subpoena, exhibit with specific document requests for Subpoena, FRCP 45 Notice, and cover letters to Counsel; Working sessions with co-Counsel discussing strategy for service of, and revisions to be made to, Subpoena, exhibit with specific document requests for Subpoena, FRCP 45 Notice, and cover letters to counsel; Review news articles regarding expanding scope of criminal investigation into Lafitte and others, and potential for RICO liability	CTM	2.70	\$769.50
10/7/2022	Call with CTM regarding Murphy & Grantland Subpoena	JGR	0.20	\$57.00

REDACTED

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
10/11/2022	Review status of Discovery and strategy regarding extension of time to amend; Confer with RHM regarding news articles	AKE	0.90	\$495.00
10/11/2022	Conference with JGR and AKE regarding discovery plan, legal analysis to be conducted, and strategy for proving claims against each Defendant and potential Defendant; Outline legal analysis to be completed as discussed in meeting; Follow-up discussion with JGR regarding obtaining additional bank records	CTM	1.70	\$484.50
10/11/2022	Emails with counsel regarding discovery and deadlines	JGR	0.40	\$114.00
10/11/2022	Conference with AKE, CTM regarding strategy, tasks	JGR	0.40	\$114.00
10/12/2022	Review of prior news reporting stories and select filings and prepare summary per AKE	RHM	3.10	\$542.50
REDACTED				
10/12/2022	Emails with counsel regarding Discovery; Outline strategy for next five weeks, circulate; Confer regarding Fleming invocation of 5th Amendment in Discovery Responses	JGR	2.40	\$684.00
10/12/2022	Supplement attorney case task and strategy outline; Attorney analysis regarding discovery and research to be conducted going forward; Confer with co-Counsel regarding potential Motion to Compel as to Fleming in light of Fifth Amendment assertion; Review series of correspondence regarding conference call with client	CTM	1.50	\$427.50
REDACTED				
10/13/2022	Complete review of news stories and summary outline per AKE; Finalize letter to Briggs and Mocchiola regarding history and recent developments per AKE	RHM	4.20	\$735.00
REDACTED				

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	REDACTED			
10/14/2022	Draft and serve Subpoena to McCoy Conference with JGR.	AGG	0.30	\$45.00
10/14/2022	Telephone call with clients regarding strategy, amendment, parties; Call with Receiver and counsel; Emails and Subpoena to same; Email Griffin regarding Discovery Responses; Research effect of signing pleading REDACTED	JGR	3.80	\$1,083.00
10/18/2022	Review and index Palmetto State Bank Responses to Nautilus's Request for Production and documents; Emails to/from Pendarvis office to schedule conference; Revisions to Amended Complaint; Coordinate 10/25/2022 lunch meeting with GTWalker	AGG	0.50	\$75.00
10/18/2022	Continue review of Discovery Responses of various parties and collecting witness identification and proposed testimony; Initial cursory review of production from Palmetto State Bank	RHM	2.60	\$455.00
10/18/2022	Prepare summary of meeting and forward Answer of Palmetto State Bank with Amended Pleading; Revisions to Complaint; Prepare for and attend meeting with Richter; Call to Briggs	AKE	4.40	\$2,420.00
10/18/2022	Research viability of asserting Conspiracy Subsection of RICO Act against Laffitte and conspiracy and related suits arising out of third-party insurance fraud; Review latest version of Second Amended Complaint and outline potential supplements to make to same prior to filing	CTM	3.60	\$1,026.00
10/18/2022	Attend meeting with Richter; Revise Complaint; Research RICO; Respond to Hill email	JGR	3.60	\$1,026.00
10/19/2022	Receive and index Deposition Transcript of Laffitte	AGG	0.20	\$30.00
10/19/2022	Revisions to letter to Briggs regarding case status and planning per AKE; Continue review of PSB production; Begin Deposition summary of R. Laffitte from Beach v. Parker Litigation	RHM	6.10	\$1,067.50

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REDACTED				
10/20/2022	Prepare Subpoena to Bland Richter; Letter to all counsel serving Subpoena	AGG	0.30	\$45.00
10/20/2022	Review Richter suit in Hampton; Call with Richter; Review all Briefing and Gergel Order regarding Dismissal; Draft Brief to Disqualify Receiver	AKE	5.80	\$3,190.00
10/20/2022	Calls with Briggs, Pendarvis; Research regarding Amendment and Default; Confer with AKE regarding Receiver and filing strategy; Call with Ediscovery vendor; draft Subpoena to Bland Richter; Revise Amended Pleading	JGR	4.00	\$1,140.00
10/20/2022	Initial research on grounds for potential Motion to Strike pleading and Discovery Responses of Co-Receiver; Confer with AKE regarding potential grounds for striking Co-Receiver's pleadings; Review Subpoena to Bland Richter and series of correspondence on same; Review updated draft of Second Amended Complaint; Review pleadings filed by Co-Receiver in Satterfield matter comparing same with pleading in our matter and review Satterfield docket for any challenges made to filings by Co-Receiver	CTM	1.80	\$513.00
REDACTED				

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Professional Services

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10/21/2022	Prepare Brief and review RICO caselaw; Prepare Agreement with Griffith	AKE	3.90	\$2,145.00
10/21/2022	Emails and calls with E-vendor; Email client regarding same; Review email from Pendarvis regarding 5th Amendment and Discovery	JGR	0.40	\$114.00
REDACTED				
10/25/2022	Continue supplementing Motion to Strike and/or Dismiss Pleading and Discovery Responses of Co-Receiver; Review Defendant Moss & Kuhn Responses to Requests for Production and related correspondence; Brief initial review of document production from Defendant Moss & Kuhn for content; Review latest version of draft Second Amended Complaint; Review Johnson v. Collins case filings regarding seeking insight as to Judge Gergel's views on RICO claims	CTM	3.40	\$969.00
10/25/2022	Review Motion regarding Receivers' Authority and revise; Review draft Amended Pleading, Research same and revise	JGR	3.40	\$969.00
REDACTED				
10/26/2022	Prepare Brief; Call with Mocciaolo	AKE	1.60	\$880.00
REDACTED				
10/27/2022	Receive and index Moss & Kuhn "Confidential" production Revise Tracker Spreadsheet.	AGG	0.30	\$45.00
REDACTED				

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
10/27/2022	Draft client Brief; Confer with JGR regarding Research	AKE	1.20	\$660.00

REDACTED

For Professional Services Rendered: 225.80 \$73,000.00

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/17/2022	AKE, JGR Lunch with Richter regarding file and guidance	\$75.60

Total Costs: \$75.60

Total Amount of this Bill: \$73,075.60

Previous Balance: \$0.00

Balance Due: \$73,075.60

This invoice is due on 12/16/2022

TIMEKEEPER SUMMARY

Timekeeper	Total Hours	Hourly Rate
Andrew Epting	53.3	\$550.00
Angela Goddard Gross	10.1	\$150.00
Clinton Magill	50.9	\$285.00
Jaan Rannik	74.1	\$285.00
Rhonda McCrow	37.4	\$175.00

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Scottsdale, AZ 85260

Invoice**Invoice Date:** Jan 24, 2023**Invoice Num:** 1560**Billing Through:** Dec 31, 2022**In Reference To:** Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
11/1/2022	Review proposed amended pleading and call to Aiken REDACTED	AKE	0.70	\$385.00
11/2/2022	Conference with JGR regarding Amendment and Service of Motion REDACTED	AKE	0.60	\$330.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
		REDACTED		
11/15/2022	Research Accomplice Liability under 18 USC 2 and relation to RICO; Letter to all counsel with Subpoena response from co-receivers; Review Briefs in Johnson v. Collins	JGR	3.40	\$969.00
		REDACTED		

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

11/23/2022	Review Indictments and Verdict; Prepare letter to client regarding strategy, conviction and liability	AKE	3.30	\$1,815.00
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REDACTED

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	REDACTED			
11/28/2022	Finalize Reply Brief in Support of Motion to Determine Co-Receiver's Authority; Call with Gressette regarding Discovery status; Email Pendarvis regarding Fleming Discovery Responses REDACTED	JGR	5.20	\$1,482.00
11/30/2022	Research and revise Amended Complaint; Send PSB Discovery to client; Confer with RHM regarding PSB production; Emails with PSB counsel regarding Confidentiality Order REDACTED	JGR	3.60	\$1,026.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
12/1/2022	Further revisions to Amended Complaint; Research CSX case and other instances of Insurers using RICO; Call with Lofton regarding accomplice liability mens rea requirements; Call with Pendarvis regarding Fleming; Confer with AKE on strategy REDACTED	JGR	4.00	\$1,140.00
12/2/2022	Review correspondence from counsel for Co-Receivers and Defendants Fleming and Moss & Kuhn discussing Confidentiality Order; Confer with co-counsel regarding potential case update to client and review article regarding Judge Gergel related to same REDACTED	CTM	0.50	\$142.50
12/6/2022	Draft letter to Pendarvis; Revise pleading and confer with CTM on RICO considerations; Review materials from Werking; Review new PSB production REDACTED	JGR	6.20	\$1,767.00

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	REDACTED			
12/7/2022	Finalize Pendarvis letter; RICO Research	JGR	1.20	\$342.00
	REDACTED			
12/8/2022	Research and draft Motions to Amend Pleading, Scheduling Order; Revise pleading and send to client for review; Strategize Discovery; Document review; Confer with RHM regarding discovery vendor; Conference with AKE, CTM regarding pleading strategy	JGR	5.40	\$1,539.00
12/8/2022	Review latest draft of Second Amended Complaint and consider possible supplementation; Confer with co-counsel on same and pleading strategy	CTM	1.50	\$427.50
	REDACTED			
12/9/2022	Summarize proximate cause argument; Email CTM regarding proximate cause and research; Research vicarious liability for RICO violations, vicarious fiduciary obligations; Review and prepare materials for upload to document review platform	JGR	6.00	\$1,710.00

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12/9/2022	Confer with co-counsel on additional research needed for RICO claims; Research relevant Federal law determining whether employee knowledge is imputed to company for RICO conspiracies and vicarious liability for fiduciary duties under SC law REDACTED	CTM	1.30	\$370.50
12/12/2022	Emails with KLD regarding document uploads; Email counsel regarding extension of Scheduling Order; Review B. Womble testimony at Laffitte trial REDACTED	JGR	2.20	\$627.00
12/13/2022	Review caselaw relevant to Respondent Superior and Conspiracy; Confer with counsel	CTM	0.20	\$57.00
12/14/2022	Draft proposed Consent Second Amended Scheduling Order; Revisions to Motion to Amend Scheduling Order	AGG	0.20	\$30.00
12/14/2022	Review Liquid Air and Petro Tech cases, and strategy regarding Respondent Superior Liability; Call to Briggs	AKE	0.80	\$440.00
12/14/2022	Further research Circuit split on 1962(c) vicarious liability; Prepare memo; Emails with counsel regarding Motion	JGR	2.40	\$684.00
12/14/2022	Review draft Motion to Amend Scheduling Order considering whether same complies with local rules; Confer with co-counsel on need to seek Consent for, and Consent of, Motion to Amend Scheduling Order; Review series of correspondence from Defendants' counsel regarding Motion to Amend REDACTED	CTM	0.60	\$171.00
12/15/2022	Finalize and file Motion to Amend Scheduling Order; Emails with counsel regarding same; Confer with AKE regarding Vicarious Liability Research	JGR	2.60	\$741.00

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REDACTED				
12/16/2022	Review Email from KLDISCOVERY with questions regarding 12/15/2022 Upload; Research uploaded data and respond to DeLoreto questions regarding Murphy Grantland uploads	RHM	3.10	\$542.50
12/16/2022	Review Cox and Oki cases on Respondeat Superior	AKE	1.50	\$825.00
12/16/2022	Review Confidentiality Order entered by Court and correspondence confirming whether changes were made between what was proposed and what was entered	CTM	0.20	\$57.00
12/19/2022	Review Email from KLDISCOVERY and Friday uploads and attempt new uploads	RHM	0.30	\$52.50

REDACTED

12/21/2022	Review and revise Report and review 8th Circuit case	AKE	1.30	\$715.00
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REDACTED

12/22/2022	Revise letter to Client; Review Amended Scheduling Order	JGR	0.40	\$114.00
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Epting & Rannik, LLC

46A State Street,
Charleston, SC 29401-
Tel: 843-377-1871 Fax: 843-377-1310
ake@epting-law.com

Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Bultherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: Jan 24, 2023
Invoice Num: 1560
Billing Through: Dec 31, 2022

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
	REDACTED			
12/27/2022	Review criminal trial Transcripts and RICO Research	AKE	3.10	\$1,705.00
12/27/2022	Review correspondence from counsel for Fleming regarding objecting to proposed Amendment; Analysis regarding next steps in amending	CIM	0.20	\$57.00
	REDACTED			

For Professional Services Rendered: 186.10 \$64,751.00

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	REDACTED	

Total Amount of this Bill:	\$68,657.33
Previous Balance:	\$0.00
Balance Due:	\$68,657.33

Epting & Rannik, LLC

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Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: Jan 24, 2023

Invoice Num: 1560

Billing Through: Dec 31, 2022

In Reference To: Nautilus Insurance (2138-001:) - Managed by (JGR)

This invoice is due on 2/23/2023

TIMEKEEPER SUMMARY

Timekeeper	Total Hours	Hourly Rate
Andrew Epting	57.8	\$550.00
Angela Goddard Gross	11.3	\$150.00
Clinton Magill	28.7	\$285.00
Jaan Rannik	69.4	\$285.00
Rhonda McCraw	18.9	\$175.00

Epting & Rannik, LLC

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ake@epting-law.com

Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice**Invoice Date:** May 4, 2023**Invoice Num:** 1573**Billing Through:** Mar 31, 2023**In Reference To:** Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
1/5/2023	Research continuity, pattern, and finality of Judgment for RICO Estoppel; Review correspondence from Satterfield attorney regarding Subpoena response; Review correspondence with PSB counsel regarding Discovery Requests; Confer with co-counsel regarding recent Research; Attend strategy session with AKE and JGR.	CTM	4.90	\$1,396.50
1/5/2023	Research "Scope of Employment"; Prepare memorandum on Research; Strategy with AKE and CTM	JGR	2.80	\$798.00
REDACTED				
1/9/2023	Confer with co-counsel regarding documents produced by Satterfield counsel	CTM	0.10	\$28.50
REDACTED				
1/10/2023	Review Palmetto State Bank production; Review Fleming documents; Code documents in Nebula	JGR	5.60	\$1,596.00
REDACTED				
1/11/2023	Review emails 12/15 to 01/11 regarding recent uploads and service of supplemental production from PSB, Subpoena response from Bland Richter, PSB 12/23 spreadsheet and redacted Minutes, and PSB production with corrected Bates numbers	RHM	0.80	\$140.00

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John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: May 4, 2023

Invoice Num: 1573

Billing Through: Mar 31, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
1/13/2023	Receive and index Order Granting Motion to Stay (87)	AGG	0.20	\$30.00
1/13/2023	Analyze Court's Order granting Murdaugh requested Stay; Conference with JGR regarding scope of Order	CTM	0.30	\$85.50
REDACTED				
1/17/2023	Telephone call to Moss and Kuhn regarding One Note link; Email to Radford	AGG	0.20	\$30.00
REDACTED				
1/18/2023	Analyze Mead v. Reliastar case regarding Finality of Judgment Review correspondence and link from Moss & Kuhn; Confer with co-counsel regarding context	CTM	0.70	\$199.50
1/19/2023	Prepare for meeting with Womble; Review exhibits and testimony of witnesses; Review CTM Memo	AKE	2.50	\$1,375.00
1/19/2023	Prepare for and attend meeting with B. Womble; Memo to file regarding meeting	JGR	2.80	\$798.00
REDACTED				
1/20/2023	Review production from Bland Richter and preparation of reviewed material for upload to Nebula	RHM	3.60	\$630.00
REDACTED				
1/23/2023	Continue response to 12/12/2022 Email from KLDisccovery by breakdown of Moss & Kuhn Production in preparation to re-upload per 12/12/2022 Email	RHM	1.40	\$245.00
REDACTED				

Epting & Rannik, LLC

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Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice**Invoice Date:** May 4, 2023**Invoice Num:** 1573**Billing Through:** Mar 31, 2023**In Reference To:** Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

1/24/2023	Draft update to client; Research Common Law Conspiracy vs. RICO Conspiracy; Confer with AKE	JGR	3.20	\$912.00
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REDACTED

1/26/2023	Continue review of Bland Richter Subpoena production and begin upload of reviewed materials	RHM	1.60	\$280.00
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REDACTED

1/31/2023	Review and prepare Bland Richter Subpoena production for upload to Nebula	RHM	3.70	\$647.50
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Invoice

Invoice Date: May 4, 2023

Invoice Num: 1573

Billing Through: Mar 31, 2023

In Reference To: Nautilus Insurance (2138-001) - managed by (JGR)

Professional Services

Date	Description	Employee	Hours	Amount
	REDACTED			
2/1/2023	Continue review of Bland Richter Subpoena production and identify problems with various files with some information inaccessible; Upload to Nebula available files; Prepare Email to Mongillo at Bland Richter advising which files are inaccessible and the range of duplicate Bates numbers	RHM	5.70	\$997.50
2/1/2023	Review Bland Richter Subpoena response; Confer with RHM on upload to database for further review; Continue review of Laffitte Bond Hearing Transcript	JGR	1.80	\$513.00
2/2/2023	Review and respond to email from KLDISCOVERY with questions related to recent uploads; Review email from Bland Richter responding to questions about problems accessing certain files; Access new Dropbox link and download to review records; Resolve issues with uploads and duplicate records; Upload to Nebula; Assemble documents pulled from review of Bland Richter documents during upload for AKE review	RHM	2.90	\$507.50
	REDACTED			
2/3/2023	Review updates regarding Satterfield Testimony at Murdaugh Trial	JGR	0.40	\$114.00
	REDACTED			
2/6/2023	Prepare additional uploads to Nebula of Co-Receiver production; Email to KLDISCOVERY regarding upload request	RHM	0.80	\$140.00
2/6/2023	Emails regarding upload of Bland Richter materials	JGR	0.20	\$57.00
2/8/2023	Review Subpoena response from Bland Richter, Emails with Client and Discovery vendor regarding same	JGR	3.40	\$969.00
2/9/2023	Review Court records for updates on related suits; Email JGR and CTM regarding Order Granting Summary Judgment in PMPED suit against A. Murdaugh	AGG	0.50	\$75.00
2/9/2023	Review testimony of Jan Malinowski, Tony Satterfield at Murdaugh murder Trial	JGR	0.80	\$228.00
2/9/2023	Review Order in PMPED suit and correspondence re same.	CTM	0.20	\$57.00
	REDACTED			

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John Briggs
 Nautilus Insurance Group
 7233 East Butherus Drive
 Scottsdale, AZ 85260

Invoice

Invoice Date: May 4, 2023

Invoice Num: 1573

Billing Through: Mar 31, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
	REDACTED			
2/16/2023	Confer with JGR on goals of Nebula searches; Begin review of Nebula documents	RHM	4.40	\$770.00
2/16/2023	Review document productions and confer with RHM; Call with Khan regarding Miller interview	JGR	3.40	\$969.00
	REDACTED			
2/21/2023	Nebula review and begin tagging documents	RHM	1.30	\$227.50
	REDACTED			
2/22/2023	Nebula search and review of documents and tagging categories	RHM	4.40	\$770.00
2/23/2023	Continue review of Nebula production documents	RHM	2.00	\$350.00
2/23/2023	Email update to client regarding Miller interview; Calls and messages with Khan regarding same; Review Murdaugh murder Trial Testimony and assess Murdaugh as witness	JGR	3.20	\$912.00
2/24/2023	Review Murdaugh Trial testimony	JGR	3.20	\$912.00
2/28/2023	Continue review of Nebula production	RHM	1.60	\$280.00
2/28/2023	Communicate with attorney for BoA regarding Forge issues	CTM	0.20	\$57.00
3/1/2023	Review article regarding Trial; Confer with RHM; Confer with JGR and CTM on strategy regarding criminal trial and effect	AKE	1.10	\$605.00
3/1/2023	Conference with AKE, CTM on impact of different Murdaugh Trial outcomes and strategy moving forward and scope of Conspiracy	JGR	1.20	\$342.00
3/1/2023	Conference with AKE & JGR re impact of different Murdaugh Trial outcomes and strategy moving forward	CTM	1.20	\$342.00
	REDACTED			
3/2/2023	Confer with co-counsel regarding implications of Murdaugh Verdict on Client suit	CTM	0.30	\$85.50
3/3/2023	Revise pleading to broaden scope of Conspiracy; Outline Bank Deposition topics; Confer with AKE, CTM	JGR	3.20	\$912.00

REDACTED

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Nautilus Insurance Group
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Scottsdale, AZ 85260

Invoice

Invoice Date: May 4, 2023

Invoice Num: 1573

Billing Through: Mar 31, 2023

In Reference To: Nautilus Insurance (2138-001); - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

3/8/2023	Review case law on SC Common Law Conspiracy and review CTM Research	AKE	0.90	\$495.00
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REDACTED

3/8/2023	Analyze Order under seal as to Murdaugh privilege; Confer with co-counsel re impact of same on waiver of mediation confidentiality or other documents subject to privilege, Hampton County conspiracy theories, seeking guardianship/PR RICO cases from other jurisdictions; Continue research re law applicable to mediation confidentiality.	CTM	1.30	\$370.50
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REDACTED

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Scottsdale, AZ 85260

Invoice**Invoice Date:** May 4, 2023**Invoice Num:** 1573**Billing Through:** Mar 31, 2023**In Reference To:** Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

3/10/2023	Research emails for claims file; Conference with JGR	AGG	0.20	\$30.00
3/10/2023	Review Fleming Indictments; Call to Solomons and Cooke; Prepare outline of liability of PSB and Fleming; Confer	AKE	3.50	\$1,925.00
3/10/2023	Emails with Briggs regarding SIU documents, Streater Report, KLDDiscovery status; Email AUSA regarding Motion for Clarification of Murdaugh privilege claims; Review FDIC Director Testimony from Laffitte Trial; Conference with AKE regarding parties' liability	JGR	6.00	\$1,710.00

REDACTED

3/13/2023	Receive and index SIU documents from Client; Conference with JGR	AGG	0.20	\$30.00
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REDACTED

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Invoice

Invoice Date: May 4, 2023
Invoice Num: 1573
Billing Through: Mar 31, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
3/15/2023	Research re special damages and recent law waiving pleading requirement in conspiracy claims; Confer with co-counsel re impact of same; Review docket of Hampton County case listing Murdaugh as Plaintiff and James Moss as attorney re understanding context of same.	CTM	0.60	\$171.00
REDACTED				
3/16/2023	Conference with AGG regarding Murdaugh residences and timings	JGR	0.40	\$114.00
3/16/2023	Confer with co-counsel re vicarious liability issues.	CTM	0.20	\$57.00
3/17/2023	Research Hampton County Register of Deeds and Tax Assessor; Call with Assessor's office	AGG	0.50	\$75.00
REDACTED				
3/17/2023	Research effect of unfilled Settlement Order; Research re probate code provisions providing potential claims for third-parties to the estate; Confer with AKE & JGR re strategy based on initial research results.	CTM	5.70	\$1,624.50
3/17/2023	Research Personal Representative duties and PA member liability; Conference with AKE, CTM regarding strategy; Draft memo regarding same	JGR	4.40	\$1,254.00
3/20/2023	Review latest version of second amended complaint; Confer with co-counsel re potential content to add to same.	CTM	0.50	\$142.50
REDACTED				
3/21/2023	Confer with co-counsel re case updates to be sent to client; Review Defendant M&K's trust balance sheets re identifying discrepancies in same.	CTM	0.40	\$114.00
3/22/2023	Prepare strategy on effect of no dismissal of State Action; Calls to each counsel regarding Scheduling Order	AKE	0.90	\$495.00
3/22/2023	Continue Nebula search reviewing PSB documents	RHM	1.80	\$315.00
3/22/2023	Revise letter report to Client; Research regarding same; Email AUSA regarding Motion	JGR	1.60	\$456.00

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Invoice

Invoice Date: May 4, 2023

Invoice Num: 1573

Billing Through: Mar 31, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
3/22/2023	Brief research re escrow duties to third-parties in relation to settlement funds.	CTM	0.30	\$85.50
3/23/2023	Review and summarize Transcript of Laffitte Bond Hearing with focus on mention of Westendorf; Review exhibits to draft Transcript of Westendorf Deposition from Satterfield v Murdaugh case, create index list and pull exhibits for AKE	RHM	5.30	\$927.50
3/23/2023	Review Probate file; Outline Westendorf Deposition	AKE	1.10	\$605.00
3/23/2023	Research rescission; Research contract remedies for later-discovered Fraud; Review Baeza case; Review memo to file; Confer with co-counsel regarding same	JGR	2.80	\$798.00
3/23/2023	Confer with co-counsel re research and analysis needed as to probate settlement requirements.	CTM	0.20	\$57.00
3/24/2023	Continue review of Westendorf Deposition and probate court filings	AKE	1.80	\$990.00
REDACTED				
3/28/2023	Continue review of Westendddorf testimony; Prepare notes regarding PR failures; Prepare strategy on Rescission or Affirmative Injunction to Perform as Legally Required	AKE	1.40	\$770.00
3/28/2023	Review claims notes and additional SIU documents re seeking potential hot docs; Review correspondence from counsel for Defendant Murdaugh and US attorney re privilege issues; Confer with co-counsel re potential impact of Defendant Murdaugh's intended answer to Nautilus complaint.	CTM	1.40	\$399.00
REDACTED				

For Professional Services Rendered:**255.90****\$79,268.00****Additional Charges**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
1/5/2023	#1621KLDISCOVERY Nebula Hosting Services Oct- Nov 2022 (Inv. PO100263069 & PO100266784)	\$267.50

Epting & Rannik, LLC

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Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: May 4, 2023

Invoice Num: 1573

Billing Through: Mar 31, 2023

In Reference To: Nautilus Insurance (2138-001;) - Managed by (JGR)

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	REDACTED	
3/2/2023	#1643 KLDISCOVERY Inv. PO100272174 (Dec 2022)	\$1,726.50
3/2/2023	#1643 KLDISCOVERY Inv. PO100276465 (Jan 2023)	\$654.00
Total Costs:		<u>\$2,844.04</u>
Total Amount of this Bill:		<u>\$82,112.04</u>
Previous Balance:		\$0.00
Balance Due:		<u><u>\$82,112.04</u></u>

This invoice is due on 6/3/2023

TIMEKEEPER SUMMARY

<u>Timekeeper</u>	<u>Total Hours</u>	<u>Hourly Rate</u>
Andrew Epting	52.8	\$550.00
Angela Goddard Gross	14.5	\$150.00
Clinton Magill	34.3	\$285.00
Jaan Rannik	102.5	\$285.00
Rhonda McCraw	51.8	\$175.00

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Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: Jul 27, 2023
Invoice Num: 1586
Billing Through: Jun 30, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
4/4/2023	Receive and index Status Report by Alex Murdaugh; Conference with JGR	AGG	0.20	\$30.00
4/4/2023	Draft proposed Third Amended Scheduling Order	AGG	0.20	\$30.00
4/4/2023	Prepare outline of 3rd section of Westendorff Deposition; Review Exhibits regarding Court approval	AKE	1.40	\$770.00
4/4/2023	Research remedies; Draft Motion to Amend Scheduling Order; Emails with counsel regarding same	JGR	2.00	\$570.00
REDACTED				
4/5/2023	Telephone call with Judge Orr; FOIA request to Probate Court; Efile Motion to Amend Scheduling Order; Conference with JGR regarding withdrawal of Motion; Telephone call to Clerk of Court; Efile JGR letter to Judge Gergel; Pull exhibits to Westendorff Deposition; Conference with AKE	AGG	1.00	\$150.00
4/5/2023	Prepare status report and review Deposition excerpts for Client	AKE	1.60	\$880.00
4/5/2023	Finalize Motion to Amend; Confer with CTM, AKE regarding Rescission and Research same	JGR	1.60	\$456.00
4/5/2023	Research Arguments for Undoing Settlement and Declaring Same Void; Confer with AKE and JGR regarding Rescission remedies; Research Applicability of Rescission to Settlements; Draft summary of Murdaugh players and key liability of each	CTM	10.50	\$2,992.50
4/6/2023	Confer with CTM regarding Settlement documents in Satterfield; Review file and extract Settlement documents	AGG	2.00	\$300.00
4/6/2023	Conference with JGR regarding remedy on voidness; Establish chronology on Westendorff actions as PR	AKE	1.70	\$935.00
REDACTED				
4/6/2023	Review Court Order as to Status Report and analysis with comparison of various Satterfield settlement documents; Continue research regarding arguments for undoing settlement and declaring same void; Continue drafting summary of Murdaugh players and liabilities; Prepare proposed graphic visual with Murdaugh players and key concepts; Analyze checks from Murdaugh PSB accounts per PSB production and highlight possible re-routing of Satterfield funds from BOA into spreadsheet	CTM	10.60	\$3,021.00

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Invoice

Invoice Date: Jul 27, 2023

Invoice Num: 1586

Billing Through: Jun 30, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
4/7/2023	Revisions to AKE Status Report Finalize report; review Laffitte transcript re PR and conservatorships; conferences with JGR and CTM; research deposits and charge on Gloria Satterfield bank statements; email to client with report.	AGG	1.50	\$225.00
4/7/2023	Review Probate Court and Release documents; Outline strategy of effect of Probate/Circuit Court caption error	AKE	3.10	\$1,705.00
4/7/2023	Review Rescission Research, update memo; Review Murphy Grantland emails; Call J. Long regarding further materials	JGR	3.60	\$1,026.00

REDACTED

4/11/2023	Prepare timeline and strategy from Westendorf exhibits on vicarious liability of M&K and PSB	AKE	2.50	\$1,375.00
4/11/2023	Email Judge Orr at Hampton County Probate Court regarding status of FOIA request; Update spreadsheet of Murdaugh notes and payments; Telephone call to Court Reporter regarding Westendorf Transcript	AGG	1.00	\$150.00

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Invoice

Invoice Date: Jul 27, 2023
Invoice Num: 1586
Billing Through: Jun 30, 2023

In Reference To: Nautilus Insurance (2138-001:) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
4/13/2023	Respond to Email from Judge Orr regarding FOIA request	AGG	0.20	\$30.00
REDACTED				
4/14/2023	Research and strategy for Discovery and Briefing	AKE	2.60	\$1,430.00
4/14/2023	Revisions to Report to Macciolo and Briggs; Receive and index Text Orders regarding Gressette Request for Protection	AGG	1.00	\$150.00
4/14/2023	Revise letter to Client; Confer and refine strategy on Liability; Review Gergel Orders; Email AUSA regarding Murphy Grantland File; Email Mongillo regarding Westendorf Transcript; Review Westendorf Transcript and Murdaugh Bank Records	JGR	3.80	\$1,083.00
4/17/2023	Revise Client letter; Research relating to letter	JGR	1.80	\$513.00
4/17/2023	Revise letter to Clients regarding Underlying Settlements	CTM	0.30	\$85.50
4/18/2023	Review memos regarding meeting and review letter to Client, review notes for filing of Testimony and Exhibits	AKE	1.40	\$770.00
4/18/2023	Revise Complaint in event Scheduling Order is Not Amended; Research Probate Rule 43(k)	JGR	4.60	\$1,311.00
4/19/2023	Return to review and tagging documents in Nebula	RHM	3.30	\$577.50
4/19/2023	Email to Judge Orr regarding FOIA; Review documents produced by Probate Court in response to FOIA; Conference with CTM; Research Statutes	AGG	1.00	\$150.00
4/19/2023	Prepare for and attend call with Client re RHM time line, Revise Complaint	AKE	2.60	\$1,430.00

Epting & Rannik, LLC

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ake@epting-law.com

Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: Jul 27, 2023

Invoice Num: 1586

Billing Through: Jun 30, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
	REDACTED			
4/20/2023	Review and file Text Order Lifting Stay; Review and file Third Amended Scheduling Order	AGG	0.20	\$30.00
4/20/2023	Continue Nebula review flagging documents and downloading those of particular interest	RHM	3.60	\$630.00
4/20/2023	Revise letter to Client	JGR	0.40	\$114.00
	REDACTED			
4/24/2023	Research and draft Motion to Compel Production by Murphy Grantland; Review Gergel Orders regarding same; Call with J. Long regarding Gergel Orders and Document Review; Email E. Limehouse regarding status; Emails with PSB Counsel regarding Discovery	JGR	4.00	\$1,140.00
	REDACTED			
4/25/2023	Review Gergel Opinion, Strategy regarding 5th Amend Presumption, Gergel Opinion; Confer with JGR regarding Long	AKE	1.50	\$825.00
4/25/2023	Research Fifth Amendment Presumptions, When Applied; Emails with Long regarding M&G Documents and review	JGR	1.40	\$399.00
4/25/2023	Research Void Settlement Argument	CTM	3.40	\$969.00
	REDACTED			
4/26/2023	Telephone calls to Hampton County Clerk of Court; Telephone call to Illinois Circuit Court; Online Research for Pleadings	AGG	0.50	\$75.00

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4/26/2023	Review M&G file at Nexsen Pruet Columbia office; Confer with Long regarding production of file	JGR	8.40	\$2,394.00
4/26/2023	Research Settlement Arguments, Probate Docket, Satterfield Docket, Potential Claims, M&K	CTM	6.80	\$1,938.00
4/27/2023	Calls to Hampton County Clerk of Court and report to CTM; Letter to St. Clair Illinois Circuit Court regarding copy request; Research online filings for objections to Murdaugh Motion for Fees; Conference with JGR	AGG	0.50	\$75.00
4/27/2023	Telephone call with Client; Memos to Client regarding Common Interest Privilege	AKE	0.80	\$440.00
4/27/2023	Review and revise M&G Subpoena; Call with Long; Confer with RHM; Review Probate Code Provisions	AKE	3.40	\$1,870.00
4/27/2023	Draft memo to file regarding M&G Document Review, Contents, Status of Production; Prepare letter to Long regarding same; Confer with AKE regarding Common Interest Agreement with Berkley and draft same; Draft memo to Client regarding all of the above; Email Long regarding Subpoena to M&G; Draft additional Subpoena to M&G	JGR	8.60	\$2,451.00
4/27/2023	Draft memorandum for Clients regarding Void Settlement Facts and Arguments; Continue Research into new Void Settlement Theory	CTM	5.30	\$1,510.50
4/28/2023	Draft second Subpoena to Murphy and Grantland per JGR	AGG	0.20	\$30.00
4/28/2023	Prepare, Research Strategy regarding Memo of Law and Facts; Review Subpoenas; Review Long memos and respond; Revise Common Interest Agreement and Client correspondence	AKE	3.80	\$2,090.00
4/28/2023	Revise second M&G Subpoena and serve; Emails with Long regarding Intentions; Email Client regarding same; Revisions to Common Interest Agreement and send to Client	JGR	2.00	\$570.00
4/28/2023	Research Entry of Judgment, E-filing Rules for Order Entry; Review Satterfield Petitions; Continue drafting Memorandum for Clients regarding Void Settlement Facts and Arguments	CTM	7.40	\$2,109.00
5/1/2023	Receive and index Hampton County Complaint and provide to CTM per request	AGG	0.20	\$30.00
REDACTED				
5/2/2023	Review Brief in preparation for call with Clients; Outline Agenda for call; Prepare letter to Briggs	AKE	3.10	\$1,705.00

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REDACTED				
5/2/2023	Research reports of Murdaugh efforts to withdraw Confession, Theories as to Settlement Funds; Continue drafting Memorandum for Clients regarding Void Settlement Facts and Arguments	CTM	6.30	\$1,795.50
5/3/2023	Receive and index Common Interest Agreement signed by Briggs and Moccio; Emails to/from St. Clair Illinois Clerk of Court; Receive and index Complaint and provide to CTM per request	AGG	0.30	\$45.00
5/3/2023	Research Court filings for Oppositions to Murdaugh Motion for Fees per JGR Review and file Answer by Murdaugh to Amended Complaint; assemble and label exhibits to memo to clients; conference with CTM.	AGG	1.70	\$255.00
5/3/2023	Revisions to report to Briggs regarding case strategy on depositions and demand per AKE	RHM	0.40	\$70.00
5/3/2023	Revisions to letter memorandum and letter regarding future handling	AKE	2.60	\$1,430.00
REDACTED				
5/4/2023	Prepare exhibits to 05/04 report to clients; Upload to Dropbox and circulate link to JGR	AGG	0.20	\$30.00
5/4/2023	Review Murdaugh pleadings, memo to Client; Review CTM documents; Confer with CTM	AKE	1.50	\$825.00
5/4/2023	Revise update to Client; Outline Bank Deposition	JGR	1.40	\$399.00
5/4/2023	Research updates regarding Satterfield-Murdaugh case filings and Beach case; Confer with AKE regarding Murdaugh admissions in recent filings	CTM	1.40	\$399.00

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REDACTED				
5/5/2023	Research Effiling Rules relative to Void Settlement Theory and related Law on Entry of Judgment; Analysis of other Murdaugh cases and continued identification of relevant Testimony; Review Attorney notes on M&G issues and confer with JGR and AKE regarding same; Confer with JGR regarding potential strategies for Partial Summary Judgment on Void Settlement Theory	CTM	2.70	\$769.50
5/8/2023	Telephone call to Hampton County Clerk of Court; Email to Clerk regarding Cook v. Watkins; Email from Melinda Nettles; Confer with CTM. Telephone call to Hampton County Probate Court	AGG	0.30	\$45.00
REDACTED				
5/9/2023	Telephone calls with Nettles at Hampton County Clerk of Court per CTM	AGG	0.50	\$75.00
REDACTED				
5/9/2023	Draft Discovery Responses; Email Client regarding letter to Gressette regarding PSB responses; Review Gergel Order; Email M&K Counsel regarding Deposition date	JGR	7.20	\$2,052.00
5/9/2023	Conference with co-Counsel regarding understanding role of J. Moss and Murdaugh in Cook case	CTM	0.40	\$114.00
5/10/2023	Entry into Casemap of key dates from multiple sources including Production, Deposition and Trial Testimony	RHM	1.90	\$332.50
5/10/2023	Call with Hampton County Probate Court regarding Personal Representative for Estate of Joseph Cook per CTM	AGG	0.20	\$30.00
REDACTED				
5/10/2023	Revise Discovery Responses	JGR	5.40	\$1,539.00
5/10/2023	Conference with co-Counsel assessing need for FOIA to Probate Court for additional case files including Cook case	CTM	0.20	\$57.00

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5/11/2023	Revise Discovery Responses; Call with Counsel for PSB regarding Discovery; Review documents ahead of Production; Review Email from J. Long	JGR	7.10	\$2,023.50
5/12/2023	Prepare Documents for Production; Create Dropbox link and upload for service conference with JGR.	AGG	6.00	\$900.00
5/12/2023	Draft Discovery Responses; Research Subject-Matter Waiver; Email Client regarding same; Email Bank regarding their Responses to Discovery	JGR	5.40	\$1,539.00
5/15/2023	Finalize production and serve all Counsel and Client with Production and Responses to PSB Discovery	AGG	6.00	\$900.00
5/15/2023	Finalize and serve Discovery Responses; Email Long, Barber regarding M&G Documents	JGR	8.80	\$2,508.00
5/15/2023	Conference with co-Counsel regarding strategy for Discovery Responses and related analysis regarding documents to overcome reliance Defenses raised by PSB	CTM	1.10	\$313.50
5/16/2023	Work on Casemap entries of multiple timelines from various cases	RHM	1.90	\$332.50
5/16/2023	Draft Confidentiality greement; Revise letters to Client; Review Gressette Discovery letter; Review Lona Email and Production	JGR	4.80	\$1,368.00

REDACTED

5/17/2023	Receive and index Gressette letter to JGR regarding Discovery; Review and file 44 pages of Documents withheld by M&G for Privilege. Review and file M&G Response to Nautilus Subpoena; Research Online Court Filings in Satterfield suit for Murdaugh Motion to Vacate Confession per CTM;	AGG	0.50	\$75.00
5/17/2023	Prepare letters for Client review; Revise Confidentiality Agreement; Confer with JGR regarding Deposition Notices; Review Murdaugh Motion; Memo to Client, Strategy and Research Colorado River; Memo to Client	AKE	3.70	\$2,035.00
5/17/2023	Revise Confidentiality Agreement; Review Motion by Murdaugh to Vacate Confession of Judgment; Revise Deposition topics to PSB and M&K	JGR	3.20	\$912.00
5/17/2023	Analyze Murdaugh Rule 60(b) Motion for Relief from Judgment filed in Satterfield; Confer with AKE and JGR regarding potential impacts of same; Call with Murdaugh Counsel regarding clarification as to date in Brief regarding Settlement Documents	CTM	1.50	\$427.50

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5/18/2023	Receive and index Text Order Denying Motion to Compel by Nautilus draft Notice of 30b6 depositions of Palmetto State Bank and Moss & Kuhn, draft NOD of Chad Westendorf; prepare exhibit A topics to notices.	AGG	0.70	\$105.00
5/18/2023	Continue Casemap entries of timelines from various cases per AKE for global Timeline	RHM	1.30	\$227.50
5/18/2023	Research Colorado River Doctrine, AIA, and other avenues for Judicial intervention into State Court action to Stay a Proceeding per AKE and JGR	JRaley	3.50	\$262.50
5/18/2023	Revise 30(b)(6) topics; Emails with Counsel regarding dates for Depositions; Email Berber regarding Denial of Coverage	JGR	1.80	\$513.00
5/18/2023	Draft supplemental topics and revise Notices of Deposition for PSB 30(b)(6) and Defendant Westendorf	CTM	2.70	\$769.50
5/19/2023	Review and revise 30(b)(6) subject matters; Confer with CTM	AKE	0.70	\$385.00
REDACTED				
5/19/2023	Prepare Deposition Notices, Review Murphy Grantland Production; Email Long regarding same	JGR	2.20	\$627.00
5/19/2023	Conference with AKE regarding 30(b)(6) topics and goals related Testimony	CTM	0.50	\$142.50
REDACTED				
5/24/2023	Receive and index Notice of Appearance by Andrew Hand for Murdaugh Sr; Revise Amended Notice of Deposition of M&K and serve on all Counsel	AGG	0.30	\$45.00
REDACTED				

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5/26/2023	Review Fleming "Information" and Article; Call to Briggs regarding Privilege	AKE	1.30	\$715.00
5/26/2023	Revise PSB Deposition Outline; Review Fleming Plea Transcript; Revise M&G Malpractice memo	JGR	3.60	\$1,026.00
5/26/2023	Receive and index Transcript of Fleming Plea per JGR	AGG	0.50	\$75.00

REDACTED

5/30/2023	Review Fleming Transcript; Revise Email to Client; Revise M&G Report	JGR	0.80	\$228.00
5/31/2023	Review Westendorf Discovery and Testimony and Develop Liability case against Westendorf Vicarious Liability	AKE	3.10	\$1,705.00

REDACTED

6/2/2023	Revise Motion to Compel to PSB; Call with J. Long regarding M&G items; Review Supplemental Production and Privilege Logs; Email Long regarding outstanding items; Confer with AKE regarding Motion to Compel PSB; Email Pendarvis regarding Deposition locations	JGR	6.40	\$1,824.00
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REDACTED

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
6/5/2023	Receive and calendar PSB Subpoena to Amy Miller Review and file Supplemental Production from Murphy Grantland; prepare Transcript Request form for Russell Laffitte criminal testimony; email to court reporter; conference with JGR. review and file court reporter confirmation for deposition of HCC. Review and respond to Melinda at Hood Law Firm re deposition of M&K.	AGG	1.00	\$150.00
REDACTED				
6/6/2023	Emails to T. Pendarvis regarding Deposition and Amended Notices; Revise Notices of Depositions of PSB and M&K; Emails to/from Pendarvis office; Email to Counsel serving Amended Notices of Deposition; Email Court Reporter	AGG	0.70	\$105.00
REDACTED				
6/6/2023	Call from Phelps Dunbar regarding Subpoena received from PSB	CTM	0.20	\$57.00
REDACTED				
6/7/2023	Review Email from Long regarding M&G Productions; Review Documents produced; Call with Kennedy regarding Subpoena from PSB; Outline Response to Clement letter; Revise Motion to Compel PSB Production and review Transcripts	JGR	5.20	\$1,482.00
REDACTED				

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	REDACTED			
6/8/2023	Begin drafting memo regarding Westendorf failures as Personal Representative	CTM	1.30	\$370.50
6/9/2023	Emails to/from Court Reporter regarding PSB and M&K Depositions	AGG	0.20	\$30.00
	REDACTED			
6/9/2023	Analyze Westendorf Testimony from pending Satterfield matter; Identify key exchanges; Continue drafting memo on Westendorf's failures as PR	CTM	2.50	\$712.50
	REDACTED			
6/12/2023	Review series of correspondence involving Counsel for PSB regarding details for PSB Deposition; Review Supplemental Written Discovery in connection with same; Brief analysis of key portions of M&G Subpoena Production and review related correspondence; Analyze latest Nautilus Production and confer with co-Counsel as to potential witness related to same; Analyze Subpoena Response correspondence from Counsel for M&G and confer with co-Counsel regarding need for further information	CTM	1.00	\$285.00
	REDACTED			

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	REDACTED			
6/13/2023	Continue drafting Memo regarding Westendorf Failures as Personal Representative	CTM	3.10	\$883.50
6/14/2023	Review Laffitte Trial Testimony; Consider Strategy of Conspiracy and Vicarious Liability and that they are distinct	AKE	2.40	\$1,320.00
	REDACTED			
6/14/2023	Continue work on Memo of Westendorf Failures as Personal Representative	CTM	1.60	\$456.00
6/15/2023	Assist AKE in review of Laffitte exhibits for use in drafting Motion; Continue review and search of Nebula records relating to various issues	RHM	3.80	\$665.00
	REDACTED			
6/15/2023	Research and draft memo regarding PSB Causes of Action; Research Vicarious Liability; Research Agency/Servant Law and Aider and Abettor Law	JRaley	4.40	\$330.00
	REDACTED			
6/15/2023	Supplemental draft to Memo regarding Westendorf Failures as Personal Representative	CTM	1.70	\$484.50
6/16/2023	Receive and index M&G Supplemental Production	AGG	0.20	\$30.00
6/16/2023	Review CTM work and Memo to Client regarding Westendorf Failures; Further review Laffitte Trial Testimony	AKE	2.50	\$1,375.00
	REDACTED			
6/16/2023	Finalize Memo regarding Westendorf Failures as PR	CTM	0.70	\$199.50
	REDACTED			

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REDACTED				
6/20/2023	Telephone call with USDC Clerk regarding status of Sentencing Hearing; Draft Notice of Deposition Westendorf per JGR	AGG	0.50	\$75.00
6/20/2023	Prepare for and attend call with Client and Ransom; Confer with JGR regarding M&G Production and Motion; Research Lowdes, Future Group, Williams, Aiding and Abetting	AKE	3.10	\$1,705.00
6/20/2023	Prepare for PSB Deposition; Email Gressette regarding Deposition; Email C. Allen regarding Westendorf Deposition; Confer with AKE, JGR regarding Agency and PSB Liability; Revise PSB Outline	JGR	7.00	\$1,995.00
REDACTED				
6/21/2023	Call with Khan regarding Miller Subpoena; Identify Documents to mark Confidential; Revise 2nd Amended Complaint to remove Laffitte as Defendant; Revise Outline for PSB Deposition	JGR	8.60	\$2,451.00
REDACTED				

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	REDACTED			
6/22/2023	Revise Westendorf Notice of Deposition per JGR; Review Phelps Production, Add Confidential Footnotes; Draft Responses to PSB 1st Request for Production; Upload Production	AGG	1.50	\$225.00
6/22/2023	Search and review of Nebula Production from PSB for additions to overall Timeline	RHM	1.60	\$280.00
	REDACTED			
6/22/2023	Prepare for Depositions; Prepare 2nd Supplemental Production to PSB; Emails with Khan and Kennedy regarding Subpoenas from PSB; Review Materials from Briggs; Review Laffitte Testimony from Receiver Deposition; Emails with Bland Richter regarding Depositions	JGR	8.20	\$2,337.00
	REDACTED			
6/23/2023	Revise Nautilus' 2nd Supplemental Responses to PSB 1st Request for Production; Prepare Claims Best Practices Documents for Production and mark Confidential; Upload and serve on Counsel; Conference with JGR; Receive and calendar PSB Motion for Protective Order, Revise Production folder and update Discovery spreadsheet	AGG	1.50	\$225.00
	REDACTED			
6/23/2023	Receive and Calendar Murdaugh 1st Interrogatories and Requests for Production	AGG	0.20	\$30.00
6/23/2023	Prepare 2nd Supplemental Responses to PSB Requests for Production; Review PSB Motion for Protective Order; Email Client regarding same; Begin Drafting Response to Motion	JGR	5.80	\$1,653.00
	REDACTED			

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	REDACTED			
6/26/2023	Initial draft Response to Murdaugh 1st Request for Production; Revise Discovery spreadsheet; Research USDC online for Sentencing Hearing for LaFitte; REDACTED	AGG	0.50	\$75.00
6/27/2023	Research USDC website for sentencing hearing for Russell LaFitte; Review and file information/ Indictment for Fleming per JGR; Receive and index A. Miller Production in Response to Subpoena from PSB	AGG	0.30	\$45.00
6/27/2023	Review PSB filing regarding Protective Order; Prepare for Depositions of PSB, Westendorf; Research same REDACTED	JGR	9.20	\$2,622.00

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6/29/2023	Continue Research relating to Westendorf Deposition; Research feasibility of Admitting Prior Deposition Transcript into Evidence; Research business development as "in the course;" Research applicability of several legal concepts related to pending deposition and begin draft of reporting memo	JRaley	3.50	\$262.50
6/30/2023	Prepare for and attend 30(b)(6) Deposition of PSB and Deposition of Westendorf assisting Co-Counsel with examination strategy and follow-up questions in real-time; Confer with co-Counsel following Depositions regarding key testimony obtained, follow-up tasks, and additional document discovery to issue based on Testimony; Analyze arguments made in Satterfield Opposition to Murdaugh Request to Withdraw; Confer with co-Counsel regarding potential outcomes	CTM	9.40	\$2,679.00
6/30/2023	Prepare for and attend Depositions of PSB, Westendorf; Confer with Counsel regarding next steps; Review Bland Richter filing regarding Murdaugh Motion to Rescind Confession of Judgment	JGR	9.00	\$2,565.00
For Professional Services Rendered:			644.60	\$193,700.00

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
4/4/2023	# 1658 KLDISCOVERY Inv. PO100281437 (Feb 2023)	\$1,856.50
4/25/2023	# 1669 Hampton County Probate Court - FOIA request for Satterfield Probate File	\$90.00
4/26/2023	# 1671 St. Clair County Circuit Court, Copies of Court Filings	\$6.00
5/18/2023	# 1679 KLDISCOVERY Inv. PO100289752 (Apr 2023)	\$220.00
5/26/2023	# 1684 Karen Martin, Transcript of USDC Change of Plea Hearing 05/26/2023 (FLEMING)	\$40.80

Epting & Rannik, LLC

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Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: Jul 27, 2023

Invoice Num: 1586

Billing Through: Jun 30, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Additional Charges**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	REDACTED	
6/20/2023	#1694 KLDISCOVERY Inv. PO100293601 (May 2023) REDACTED	\$220.00

Total Costs: \$4,693.29Total Amount of this Bill: \$198,393.29Previous Balance: \$0.00Balance Due: **\$198,393.29**

This invoice is due on 8/26/2023

TIMEKEEPER SUMMARY

Timekeeper	Total Hours	Hourly Rate
Andrew Epting	111.0	\$550.00
Angela Goddard Gross	44.4	\$150.00
Clinton Magill	113.2	\$285.00
Jaan Rannik	301.8	\$285.00
Jonathan Raley	52.7	\$75.00
Rhonda McCraw	21.5	\$175.00

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Invoice

Invoice Date: Dec 21, 2023

Invoice Num: 1619

Billing Through: Sep 30, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
7/3/2023	Review rough Transcripts of Depositions	JGR	0.60	\$171.00

REDACTED

7/5/2023	Revise Brief on Motion to Compel; Review Dunbar file for Production; Call with Walker	AKE	2.40	\$1,320.00
7/5/2023	Review and file Phelps Dunbar Production; Conferences with AKE; Telephone call to Kennedy regarding extension to respond to PSB Subpoena; Research USDC filings for Russell Laffitte sentencing Hearing; Research emails and notes regarding deadlines to object to PSB Production; Review draft Motion to Compel and pull exhibits	AGG	2.00	\$300.00

REDACTED

7/6/2023	Review 1700 pages from Phelps Dunbar and draft Privilege Log	AKE	4.10	\$2,255.00
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REDACTED

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
7/6/2023	Emails to/from Pendarvis office regarding Fleming Discovery Requests; Draft Responses to Fleming Interrogatories and Requests for Production; Research USDC filings for date of sentencing Hearing for Laffitte; Emails to/from CTM regarding PSB Production; Telephone call to Phelps Dunbar regarding Privilege Logs; Receive and index Privilege Log; Conferences with AKE and Raley regarding Phelps Dunbar Production; Review of Phelps Dunbar Production	AGG	6.00	\$900.00
REDACTED				
7/7/2023	Prepare Exhibits to Motion to File Deposition; Email and telephone call to Colleton County Clerk of Court regarding Exhibit list from Murdaugh murder Trial; Segregate privileged documents in Phelps Dunbar Production; Draft letter to Jim Clement regarding Phelps Dunbar Production; Conferences with CTM and AKE; Revisions to Privilege Log; Edit Bates labels to Phelps Production; Create Dropbox link and upload documents; Email to Jim Clement; Email to Robert Kennedy	AGG	5.00	\$750.00
7/7/2023	Prepare documents of Phelps Dunbar for Production; Brief Research and filing; Request for Admission	AKE	5.00	\$2,750.00
REDACTED				
7/7/2023	Conferences with co-Counsel regarding Privilege issues; Revise Motion to file Deposition and Surreply	CTM	0.80	\$228.00

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Invoice Date: Dec 21, 2023

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In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
7/10/2023	Review and file PSB Response in Opposition to Nautilus Motion for Leave to File Deposition/Sur-Reply regarding Motion for Protective Order; Email and telephone call to Hampton County Clerk of Court regarding Exhibit list from Murdaugh Trial	AGG	0.50	\$75.00
7/10/2023	Review of Phelps file from Privilege Log including documents relating to internal firm correspondence as it relates to interpretation of requirements for 43(k) compliance; Review <i>Fronberer v Smith</i> regarding "inaction being enough to establish agency" per CTM; Organization of recent research and work product for presentation to attorney; Review all recent PSB filings since July and prepare a summary of arguments relating to Protective Order	JRaley	4.70	\$352.50
REDACTED				
7/11/2023	Receive and index clean copy of exhibit list from Hampton County; Emails with Clerk of Court; Prepare Request for Transcripts of testimony of Carson Burney and Jan Malinosky; Emails to/from Court Reporters	AGG	0.50	\$75.00
REDACTED				
7/11/2023	Email Long regarding M&G Documents; Outline Moss & Kuhn Deposition	JGR	1.40	\$377.00
REDACTED				
7/12/2023	Revisions to and finalize letter to Clement and Gressette regarding Phelps Dunbar production and remaining questions of privilege	RHM	0.30	\$52.50

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REDACTED

7/12/2023	Telephone calls with AGG regarding Document Productions; Review PSB filings	JGR	1.80	\$513.00
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REDACTED

7/13/2023	Reylse Moss & Kuhn outline; Review Fleming file	JGR	1.80	\$513.00
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REDACTED

7/17/2023	Review and summarize In Re Long Point Road Partnership, and Bennett v Carter in support of bringing Aiding and Abetting claims against Moss Kuhn & Fleming, including putting Attorney-Client Privilege at issue and therefore waiving privilege	JRaley	2.00	\$150.00
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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
7/17/2023	Preparelist of concessions to obtain from Moss, Kuhn Fleming Deposition to support claims asserted; Contact Georgia Supreme Court Clerk to obtain a letter from Fleming to GA State Bar regarding Voluntary Punishment; Review all Criminal Indictments and Research applicable Principal/Agency Law	JRaley	2.60	\$195.00

REDACTED

7/17/2023	Conference with CIM regarding relevance of meeting minutes; memo and review transcript excerpts re same; Email Long regarding M&G documents; Review Court Order setting Hearing on Motions	JGR	3.60	\$1,026.00
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REDACTED

7/18/2023	Research FRCP 26 Advisory Committee notes, 2000 Amendment, Subdivision (b)(1) relating to Discovery being allowable for prior conduct which is sufficiently similar to alleged conduct; Continue creating list of desirable concessions to obtain from Moss, Koon, Fleming Deposition	JRaley	2.40	\$180.00
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REDACTED

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7/19/2023	Read P&C article regarding settlement of Beach litigation and research file for policy dates, date of boating accident, per reference in article about an insurance policy held by Murdaugh that was holding up settlement by Murdaugh; Review of file and assist in assembling exhibits for filing Brief in Opposition	RHM	0.60	\$105.00
7/19/2023	Research possible Amendments and Additions to Nautilus' Second Amended Complaint, including Causes of Action against Defendants under UCC, and Breach of Fiduciary Duty	JRaley	2.60	\$1,195.00
7/19/2023	Prepare for Moss & Kuhn Deposition; Revise outline; Review Westendorf file	JGR	4.80	\$1,368.00
7/20/2023	Prepare for Moss & Kuhn Deposition; Revise Amended Complaint; Call with Client	JGR	6.20	\$1,767.00
7/21/2023	Review Phelps Dunbar materials to move production forward; Discussions with JGR and CTM regarding PSB and Cert	AKE	1.30	\$715.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
7/21/2023	Attend deposition of M&K virtually to support co-Counsel with additional examination questions; Revise, review, and execute Opposition to PSB Motion for Protective Order for filing; Research additional Waiver Case law for use in supplementing same; Identify and prepare final Exhibits; Confer with co-Counsel regarding key Testimony from PSB and others; Prepare rough draft of narrative list and related worksheet regarding payments diverted and tracing sums of same back to PSB	CTM	10.20	\$2,907.00
7/21/2023	Travel to and attend Moss & Kuhn Deposition; Review Opposition to Motion for Protective Order; Review PSB Summary Judgment Motion	JGR	5.80	\$1,653.00
REDACTED				
7/22/2023	Telephone call with AKE regarding Summary Judgment, Voidness; Outline Summary Judgment Response	JGR	2.80	\$798.00
REDACTED				
7/24/2023	Review Summary Judgment Motion; Revise outline of Response; Research Equitable Powers of Federal Court; Research Election of Remedies; Revise Complaint	JGR	8.80	\$2,508.00
7/24/2023	Research and draft Motion to Amend; Revise Complaint and Research regarding same	JGR	6.40	\$1,824.00
REDACTED				
7/25/2023	Draft Nautilus 3rd Supplemental Response to PSB Request for Production; Bates number documents; Upload to Dropbox; Email to Counsel serving same; Email to counsel serving JGR's letter regarding Amended Complaint; Review and file PSB letter regarding outstanding issues	AGG	0.50	\$75.00

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Professional Services

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REDACTED				
7/25/2023	Call with PSB Counsel regarding Discovery Items; Revise Amended Pleading; Research Summary Judgment Opposition	JGR	6.20	\$1,767.00
7/26/2023	Prepare and read Case Law for Opposition to Summary Judgment; Evaluate Response to Motion to Seal; read Case Law on Equity	AKE	5.60	\$3,080.00
7/26/2023	Draft Opposition to Motion to Seal; Draft Opposition to Motion for Summary Judgment; Revise Pleading and review Phelps Documents	JGR	7.00	\$1,995.00
7/27/2023	Prepare for and attend call; Research Effect of Void Contract and Monies in Escrow	AKE	3.80	\$2,090.00
REDACTED				
7/28/2023	Receive and index Supplemental Production from M&G consisting of handwritten notes; Receive and index Murdaugh Motion for Joinder or Dismiss for Failure to Join Necessary Parties; Providel to CTM, JGR, and AKE	AGG	0.20	\$30.00
7/28/2023	Confer with JGR regarding In Camera Response- Phelps Dunbar and Brief; Hold Off Filing	AKE	1.30	\$715.00
7/28/2023	Finalize and file Motion to Amend; Revise Opposition to Motion to Seal; Continue review of Phelps Documents; Review Westendorf Summary Judgment Motion; Review Murdaugh Motion to Dismiss or Join	JGR	8.40	\$2,394.00
7/28/2023	Supplement draft of proposed Second Amended Complaint	CTM	0.20	\$57.00
REDACTED				
7/30/2023	Complete review of Phelps documents; Research Summary Judgment Opposition; Revisions to same	JGR	4.80	\$1,368.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
7/31/2023	Review Reply to Response in Opposition to Motion[124] for Protective Order; Receive and index Motion for Summary Judgment of Westendorf; Review and mark Phelps Dunbar documents as Confidential and Not Confidential; Conference with JGR	AGG	2.00	\$300.00
REDACTED				
7/31/2023	Call with AKE regarding Opposition strategy; begin drafting Brief in Opposition to PSB, Westendorf	CTM	2.00	\$1,750.00
7/31/2023	Summary Judgment filings regarding Void Settlement Issues			
7/31/2023	Draft Opposition to Summary Judgment; Confer with AGG on revised Phelps Designations; Draft update to Client regarding Filings	JGR	9.00	\$2,565.00
REDACTED				
8/1/2023	Research relevant Law regarding UTPA and draft UTPA arguments for Brief in Opposition to Summary Judgment Motions	CTM	8.60	\$2,451.00
8/1/2023	Revise Summary Judgment Opposition; Research Conspiracy Claim; Research UTPA elements; Attend Laffitte sentencing	JGR	9.80	\$2,793.00
REDACTED				
8/2/2023	Revise opposition to summary judgment Motions; Call with PSB Counsel regarding Discovery items	JGR	8.80	\$2,508.00
REDACTED				
8/2/2023	Continue drafting and supplementing Brief in Opposition to PSB and Westendorf Motions for Summary Judgment; Working sessions with co-Counsel regarding Ratification, 43(k), PSB Admissions, and Judicial Estoppel theories; Research same issues	CTM	8.80	\$2,508.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
8/3/2023	Revise Opposition to Summary Judgment Motion; Revise Response to Motion to Seal; Finalize Phelps Certification; Review Bland Richter Opposition to Motion for Joinder	JGR	10.20	\$2,907.00
REDACTED				
8/3/2023	Draft memo regarding applicable Case Law supporting the remedy/effect of the underlying settlement voidness; Research UTPA from McLeod and review of cases citing to McLeod per CTM; Research Applicability of State Law v Federal Law in light of Bertzinger Opinion per JGR	JRaley	2.80	\$210.00
8/3/2023	Continue drafting Opposition to PSB and Westendorf Motions for Summary Judgment; Confer with co-Counsel regarding Memorandum strategy, McLeod UTPA Case, and Opposition Brief Exhibits; Analyze Satterfield response to Murdaugh Joinder Motion and corresponding Notices of Appearance; Review series of correspondence from USDC regarding recent Court filings	CTM	7.40	\$2,109.00
REDACTED				

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

8/8/2023	Conference with JGR regarding Phelps Production removing redactions; Mark Exhibits; Revise Discovery spreadsheet	AGG	1.00	\$150.00
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REDACTED

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REDACTED

8/10/2023	Receive and index Murdaugh Reply to Satterfield Response to Motion to Join; Email to Colleton County Clerk requesting State's Exhibits from Murdaugh Trial; Review and file Murdaugh Opposition to Nautilus Motion to Amend	AGG	0.30	\$45.00
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REDACTED

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REDACTED				
8/14/2023	Receive and index Satterfield Surreply and Opposition to Nautilus Motion to Amend by PSB and Westendorf; Receive and index Oppositions to Nautilus Motion to Amend by PSB and Westendorf; Conference with JGR regarding Confidential documents; Upload to Dropbox; Remove highlighting and add Confidential designations; Email to all Counsel; Receive and index Text Order granting Nautilus' Motion to Amend	AGG	1.00	\$150.00
REDACTED				
8/14/2023	Analysis of Satterfield Surreply to Murdaugh Joinder Motion and Murdaugh Motion to Strike and review of related correspondence; Initial review of unredacted versions of materials previously produced; Analysis of Law360 article regarding Fleming sentencing; Confer with co-Counsel regarding need for privilege exhibits of disclosure testimony; Prepare excerpts of Becky and Norris Laffitte testimony on supporting Waiver of Privilege arguments for Hearing; Continue assisting co-Counsel in preparation for Hearing tomorrow	CTM	4.00	\$1,140.00
8/15/2023	Receive and index Minute Entry from Hearing before Judge Gergel on Motion to Amend	AGG	0.20	\$30.00
8/15/2023	Research and review recent news reports relating to recent USDC filings; Provide to Attorneys for information	RHM	0.60	\$105.00
REDACTED				
8/15/2023	Prepare for and attend Hearing; Update to Client; Attend Fleming sentencing; Review Notice of Hearing on co-Receiver Motion; Update to AKE; File Amended Pleading and Emails with Court regarding filing	JGR	8.40	\$2,394.00

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REDACTED

8/18/2023	Prepare for and attend call with Clients regarding status	AKE	1.20	\$660.00
8/18/2023	Telephone call with Client; Begin drafting Motion	JGR	1.00	\$285.00

REDACTED

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REDACTED

8/29/2023	Receive and index Answer to Amended Complaint by Fleming and confer with JGR; Draft Subpoena	AGG	1.60	\$240.00
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Notices of Depositions to various non-party witnesses;
Telephone calls to Laffitte Counsel regarding Acceptance of
Service of Subpoena; Email to all Counsel serving Notice of
Deposition and Subpoena of Laffitte; Receive and index
Murdaugh Answer to Amended Complaint; Email to all
Counsel serving Nautilus 1st Interrogatories to PSB

REDACTED

8/30/2023	Continue Casemap work linking key documents to support Timeline	RHM	2.20	\$385.00
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REDACTED

8/31/2023	Continue Casemap work linking supporting documents to Timeline	RHM	1.80	\$315.00
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8/31/2023	Research Admissibility of Discovery Responses; Research effect of invoking 5th Amendment in Answer	JGR	3.80	\$1,083.00
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REDACTED

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8/31/2023	Research and draft Memorandum addressing witnesses taking the 5th Amendment and subsequently seeking to rescind the invocation, and adverse inference REDACTED	JRaley	3.60	\$270.00
9/1/2023	Telephone call with Pendarvis regarding Fleming Deposition; Revise Motion for Clarification; Research General duties to the Public; Email Briggs regarding Claims File REDACTED	JGR	3.40	\$969.00
9/7/2023	Telephone call with Pendarvis regarding Fleming Deposition; Messages with Khan regarding call with Amy Miller; Email Kennedy regarding Phelps bills; Revise Response to PSB Discovery letter REDACTED	JGR	2.60	\$741.00
9/12/2023	Conference with CTM regarding Westendorf failures as PR; Research file; Emails to/from CTM; Revisions to Response to Requests for Production	AGG	0.50	\$75.00
9/12/2023	Research Fee Shifting Provisions with relation to Nautilus' Second Amended Complaint per CTM	JRaley	2.80	\$210.00

Epting & Rannik, LLC

46A State Street,

Charleston, SC 29401-

Tel: 843-377-1871 Fax: 843-377-1310

ake@epting-law.com

Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: Dec 21, 2023

Invoice Num: 1619

Billing Through: Sep 30, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
9/12/2023	Finalize amended Discovery Responses and letter to PSB	JGR	1.80	\$513.00
9/12/2023	Confer with co-Counsel regarding best method for concise presentation of CW failures as PR and discussing Motion to Dismiss strategy	CTM	0.80	\$228.00

REDACTED

9/14/2023	Research and draft Memorandum regarding Conspiracy and Conversion and necessity of pleading and proving foreseeability	JRaley	2.40	\$180.00
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REDACTED

9/14/2023	Confer with co-Counsel regarding preparing Summary of Discovery to date for Judicial review	CTM	0.30	\$85.50
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REDACTED

9/15/2023	Call with counsel for Defendant Fleming regarding Discovery Filing Consent	CTM	0.20	\$57.00
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REDACTED

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
9/20/2023	Review Murdaugh Federal Plea Agreement and Indictment; Call with all Counsel on Status Report; Revise filing to reflect conference; Update to Client	JGR	2.80	\$798.00
9/20/2023	Conference with JGR regarding strategy for Discovery Report to Court; Attend Meet-and-Confer call with Opposing Counsel discussing plans for Status Report requested by Court	CTM	1.50	\$427.50

REDACTED

9/21/2023	Attend Murdaugh Criminal Hearing and Plea Agreement to Federal Financial Crimes and prepare memo	JRaley	4.50	\$337.50
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REDACTED

9/25/2023	Review and file Joint Status Report and Status Report of Alex Murdaugh	AGG	0.20	\$30.00
9/25/2023	Email with Briggs regarding PSB Search Terms; Draft letter to PSB regarding same; Call with FDIC Counsel regarding Testimony and draft letter requesting same; Draft Fleming questions for Deposition	JGR	5.20	\$1,482.00

REDACTED

9/26/2023	Draft update to Client; Research Restitution Procedure in Criminal Cases	JGR	1.00	\$285.00
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REDACTED

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

For Professional Services Rendered:

674.70

\$185,611.50

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
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REDACTED

7/18/2023	#1716 KLDISCOVERY Inv. PO100297522 (June 2023)	\$220.00
7/18/2023	#1717 Clark Bolen, Court Reporter, Deposition Transcript Malinowski and Westendorf (Inv. 89549)	\$1,264.80
7/21/2023	JGR lunch during Deposition 3086 Moss & Kuhn in Beaufort	\$0.00
8/2/2023	#1726 Clark Bolen Court Reporter- Deposition Transcript Fred Kuhn, 3086 Moss & Kuhn (Inv. 89756)	\$573.80

REDACTED

8/17/2023	#1729 KLDISCOVERY Inv. PO100301086 (July 2023)	\$220.00
9/14/2023	#1740 Karen E. Martin, Court Rptr, Transcript 08/15/2023 Status Conference	\$79.20
9/17/2023	#1729 KLDISCOVERY Inv. PO100301086 (July 2023)	\$220.00

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Invoice Num: 1619

Billing Through: Sep 30, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
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REDACTED

9/25/2023	#1747 KLDISCOVERY Inv. PO100305445 (Aug 2023)	\$220.00
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Total Costs:	\$3,404.90
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Total Amount of this Bill:	\$189,016.40
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Previous Balance:	\$0.00
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Balance Due:	\$189,016.40
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This invoice is due on 1/20/2024

TIMEKEEPER SUMMARY

Timekeeper	Total Hours	Hourly Rate
Andrew Epting	92.7	\$550.00
Angela Goddard Gross	45.1	\$150.00
Clinton Magill	138.3	\$285.00
Jaan Rannik	270.1	\$285.00
Jonathan Raley	110.2	\$75.00
Rhonda McCraw	18.3	\$175.00

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John Briggs
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Scottsdale, AZ 85260

Invoice

Invoice Date: Mar 14, 2024

Invoice Num: 1630

Billing Through: Dec 31, 2023

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

10/3/2023	Draft Memorandum regarding fee shifting under the SCUTPA- Are Attorney Fees Considered Court Costs (per CTM)	JRaley	4.00	\$300.00
10/3/2023	Prepare for and call with Briggs; Draft Subpoenas and Notices of Deposition; Calls with PSB Counsel regarding same; Draft Motion to Depose Prisoners; Research Laffitte prison location and restrictions; Email Bechtold regarding Laffitte Emails	JGR	6.80	\$1,938.00
10/4/2023	Review topics for Fleming Admission; Confer with JGR	AKE	0.60	\$330.00

REDACTED

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Date	Description	Employee	Hours	Amount
10/4/2023	Research imputed knowledge for purposes of demand; Confer with co-Counsel regarding strategy for PSB Counterclaim, Depositions and Discovery; Supplement Motion for Leave to Take Depositions; Call with PSB Counsel regarding Meet and Confer on latest Discovery objections to Nautilus Requests for Production	CTM	3.60	\$1,026.00
10/4/2023	Revise Motion to Take Depositions; Research same; Call with Gressette regarding schedule; Review Discovery Requests from Murdaugh and outline responses	JGR	3.60	\$1,026.00
REDACTED				
10/5/2023	Telephone call with Limehouse regarding restitution; Review Murdaugh plea transcript; Research Restitution and Interaction with Civil Liability; Update to Client on various matters	JGR	5.20	\$1,482.00
REDACTED				
10/10/2023	Review and respond to email from KLD regarding recent uploads and production questions	RHM	0.50	\$87.50
REDACTED				
10/11/2023	Prepare spreadsheet of fees paid by Nautilus to M&G and Phelps Dunbar	AGG	0.30	\$45.00

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Scottsdale, AZ 85260

Invoice**Invoice Date:** Mar 14, 2024**Invoice Num:** 1630**Billing Through:** Dec 31, 2023**In Reference To:** Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

10/12/2023	Revise Notices and Subpoena to Peters; Email Pendarvis regarding Motion	JGR	0.50	\$142.50
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REDACTED

10/16/2023	Draft email to Gressette regarding Discovery Requests; Confer with CTM; Research damages; Trebling; Revise demand per Briggs	JGR	3.40	\$969.00
10/17/2023	Research Terry Harriott and potential relationship to Brian Harriott; Research Murdaugh courier Nathan Tuten; Confer with CTM regarding same; Further Research of Kash Patel; Receive and index Murdaugh Response in Opposition to Motion to Take Depositions	AGG	1.00	\$150.00

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In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
	REDACTED			
10/17/2023	Research proper calculation of SCUTPA and RICO damages for Demand letter per JGR; Research limitations which may be present after discussions with counsel regarding Discovery in accordance with Local Rule 37.01	JRaley	2.60	\$195.00
	REDACTED			
10/18/2023	Receive and index Order from Gergel regarding Murdaugh assets; Receive and index Order on Motion to Take Depositions	AGG	0.20	\$30.00
	REDACTED			

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REDACTED

10/27/2023	Draft Responses to Murdaugh Discovery; Confer with CTM regarding same; Prepare for Peters Deposition	JGR	8.80	\$2,508.00
10/27/2023	Collaborate with co-Counsel drafting regarding Discovery Responses, Objections and Supplementing Substantive Responses	CTM	3.10	\$883.50
10/30/2023	Revise Discovery Responses to Murdaugh; Prepare for Peters Deposition; Email with Mocchiolo regarding Search terms	JGR	3.40	\$969.00
10/30/2023	Continue drafting responses to Murdaugh Discovery Requests	CTM	0.20	\$57.00
10/31/2023	Continue drafting and Supplemental Responses to Murdaugh Discovery Requests; Review Nautilus Claims File for statements related to questionable liability as referenced in Murdaugh Requests	CTM	3.90	\$1,111.50

REDACTED

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
	REDACTED			
11/2/2023	Draft Amended Scheduling Order; Confer with AGG regarding Laffitte Deposition	JGR	0.60	\$171.00
	REDACTED			
11/3/2023	Confer with JGR regarding Murphy Grantland Production; Research Production; Revise Discovery spreadsheet	AGG	0.20	\$30.00
11/3/2023	Prepare for and attend call with Briggs regarding status and next steps; Revise Scheduling Order and circulate to Counsel; Draft Motion to Amend Scheduling Order	JGR	2.40	\$684.00
	REDACTED			
11/6/2023	Emails with Counsel regarding Scheduling Order	JGR	0.40	\$114.00
	REDACTED			
11/7/2023	Initial review and Research into deposing Federal prisoners- Laffitte and Fleming	JRaley	1.00	\$75.00
	REDACTED			
11/8/2023	Finalize and file Motion to Amend Scheduling Order; Revise Demand letter; Revise Discovery Responses	JGR	2.60	\$741.00
	REDACTED			

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
11/8/2023	Continue supplementing Responses to Murdaugh Discovery Requests	CTM	0.20	\$57.00
11/9/2023	Revise Discovery Responses; Email Client same; Finalize and serve Demand letter; Research Deposing Federal prisoners	JGR	5.00	\$1,425.00
11/9/2023	Revise Responses to Murdaugh Discovery Requests	CTM	0.20	\$57.00
11/14/2023	Draft Motion to Depose Fleming; Confer with Raley regarding Prisoner Depositions and Motion to Compel regarding Laffitte; Research Rule 54(b) Reconsideration and law of the case; Confer with CTM regarding same;	JGR	4.60	\$1,311.00
11/16/2023	Review Client comments to Discovery Responses; Revise Responses	JGR	0.80	\$228.00
11/16/2023	Continue Supplementing Responses to Murdaugh Discovery Requests	CTM	0.20	\$57.00
11/17/2023	Receive and index Raley notes regarding Deposition procedure for Federal Bureau of Prisons; Revise Answers to Murdaugh 1st Request to Admit, Interrogatories	AGG	0.70	\$105.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
11/17/2023	Finalize and serve responses to Murdaugh Discovery Requests; Research Enforcement of out-of-state Subpoenas in Federal Court	JGR	1.40	\$399.00
11/17/2023	Confer with AGG on revisions to Discovery Responses to Murdaugh and Deposition considerations for Laffitte examination; Final review of Discovery Responses to Murdaugh	CTM	0.50	\$142.50

REDACTED

11/21/2023	Prepare Causes of Action Chart	JRaley	1.80	\$135.00
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REDACTED

11/25/2023	Update to Elements/Causes of Action chart	JRaley	1.00	\$75.00
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REDACTED

11/29/2023	Request Transcript of Murdaugh pled Hearing conference with JGR	AGG	0.20	\$30.00
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REDACTED

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REDACTED				
11/30/2023	E-file Motion to Take Deposition of Fleming	AGG	0.20	\$30.00
11/30/2023	Finalize Motion to Depose Fleming; Email Briggs regarding strategy on Summary Judgment; Email FL Counsel regarding parties for conflicts	JGR	4.00	\$1,140.00
11/30/2023	Supplement and revise Motion to Depose Fleming	CTM	0.30	\$85.50
12/1/2023	Review and respond to email from Court Reporter regarding Transcript of Murdaugh State Court Plea	AGG	0.20	\$30.00
REDACTED				
12/4/2023	Receive and index Transcript of Murdaugh State Court Pleato Financial Crimes; Prepare summary of indictments; Call to Megerian office regarding Motion for Admission pro hac vice; Research USDC for Middle District of Florida Rules for Admission	AGG	1.00	\$150.00
REDACTED				
12/4/2023	Research concealment and misrepresentation issues potentially relevant to Summary Judgment Motion	CTM	0.30	\$85.50
REDACTED				
12/5/2023	Conference with co-Counsel regarding analysis of impact of Fleming Disciplinary Opinion	CTM	0.20	\$57.00
REDACTED				
12/6/2023	Draft Motion for Special Appearance; Receive and index Opinion regarding Fleming Law License	AGG	0.50	\$150.00
REDACTED				
12/6/2023	Review correspondence and Subpoena from PSB Counsel for documents regarding Miller	CTM	0.20	\$57.00
12/7/2023	Revise Index to Murdaugh guilty plea to State Court Financial Crimes	AGG	1.00	\$150.00

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
12/7/2023	Revise Motion; Review Fleming Disciplinary Opinion; Review Murdaugh Plea Transcript	JGR	4.80	\$1,368.00
12/7/2023	Memo to JGR regarding Middle District of FL Local Rules; Prepare list of SC Supreme Court findings within Fleming Disciplinary Order related to Nautilus claim for use in drafting Fleming Deposition Outline and incorporation into Motion for Summary Judgment; Research applicable Law related to precedential value of State Appellate Court findings on a District Court as relate to SC Supreme Court Disciplinary Opinion on Fleming, for use in Motion for Summary Judgment	JRaley	2.60	\$195.00
12/7/2023	Conference with co-Counsel regarding continued analysis of impact of Fleming Disciplinary Opinion	CTM	0.20	\$57.00
12/8/2023	Review and file PSB Subpoena and Notice of Deposition of Coyer-Miller; Revisions to Index to Murdaugh Guilty Plea to State Financial Crimes. Arrange Service of Subpoena to Laffitte; Email to Owen and Associates regarding Laffite Deposition	AGG	0.70	\$105.00
12/8/2023	Review materials related to Disbarment; Confer with JGR regarding preparation for Coyer-Miller Deposition	AKE	1.40	\$770.00
REDACTED				
12/8/2023	Research Scope of Work arguments in large punitive damage cases in Charleston County; Confer with co-Counsel on same, as well as Motion to Enforce Subpoena and Motion for Summary Judgment/Reconsideration	CTM	0.60	\$171.00
REDACTED				

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
	REDACTED			
12/14/2023	Receive and index Response to Motion re[176] Motion to Take Deposition of Fleming	AGG	0.20	\$30.00
12/14/2023	Research applicability of Doctrine of Collateral Estoppel preventing Fleming from re-litigating issues previously heard by the Office of Disciplinary Counsel or otherwise adjudicated in his Criminal Trials	JRaley	2.80	\$210.00
12/14/2023	Call with Gressette regarding Depositions; Call with Khan regarding Miller Deposition prep; Outline breakdown of topics between phases of Discovery; Outline topics for Miller Deposition; Revisions to Motion	JGR	3.00	\$855.00
	REDACTED			
12/14/2023	Review correspondence and Order on Fleming Deposition	CTM	0.20	\$57.00
	REDACTED			
12/18/2023	Continue drafting and supplementing motions to reconsider and for Partial Summary Judgment; Conduct research related to same	CTM	7.60	\$2,166.00
12/18/2023	Revisions to Motion to Reconsider and Summary Judgment	JGR	1.20	\$342.00
12/19/2023	Continue research applicability of Doctrine of Collateral Estoppel preventing Fleming from re-litigating issues previously heard before the Office of Disciplinary Counsel and/or Criminal Trial	JRaley	3.00	\$225.00
12/19/2023	Continue drafting and supplementing Motions; Review SC Supreme Court Order regarding Justice Toal presiding over Murdaugh Hearing; Confer with co-Counsel regarding likely impact of Hearing on Murder Trial and potentially to Scheduling Order	CTM	4.10	\$1,168.50
	REDACTED			
12/20/2023	Review 4th Circuit Case regarding Scope of Employment; Memo to Client	AKE	0.60	\$330.00
12/20/2023	Research in support of arguments for reconsideration and relevance of prior acts; Supplement and revise latest draft of Motions to Reconsider and for Partial Summary Judgment	CTM	8.50	\$2,422.50
12/21/2023	Prepare revisions to Brief	AKE	2.60	\$1,430.00
	REDACTED			

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REDACTED				
12/21/2023	Continue Research in support of arguments for Reconsideration and relevance of prior acts; Continue supplementing and revising latest draft of Motions to Reconsider and for Partial Summary Judgment	CTM	4.10	\$1,168.50
12/22/2023	Continue drafting potential arguments for, and supplement latest draft of, Motions to Reconsider and for Partial Summary Judgment; Continue Research necessary to develop same	CTM	1.90	\$541.50
12/26/2023	Revisions to Motion	JGR	3.40	\$969.00
12/28/2023	Conference with JGR regarding Miller Deposition, Common Interest and Separate Counsel	AKE	0.80	\$440.00
12/28/2023	Research relevance of past, similar conduct to conspiracy claim; Revisions to Brief; Continue outlining Miller prep for Deposition; Memo to Client regarding status and thoughts on way forward; Call with Briggs	JGR	5.80	\$1,653.00
12/28/2023	Continue drafting potential arguments for, and supplement latest draft of, Motions to reconsider and for partial Summary Judgment; Continue Research into same	CTM	2.40	\$684.00
REDACTED				
For Professional Services Rendered:			384.20	\$103,235.00

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/12/2023	#1759 KLDISCOVERY Inv. PO10031070 (Sept)	\$532.00
10/12/2023	#1758 Lisa D. Smith, Court Rptr. Transcript Murdaugh Guilty Plea Hearing 09/21/2023	\$39.00

REDACTED

12/5/2023	#1782 Cathy J. Provost, Court Reporter - Transcript of 11/17/2023 Murdaugh Plea to State Financial C	\$240.00
12/5/2023	#1783 KLDISCOVERY Inv. 1001000003089 (Oct 2023)	\$1,032.00

Total Costs:	\$2,415.61
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Total Amount of this Bill:	\$105,650.61
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Previous Balance:	\$0.00
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Balance Due:	\$105,650.61
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This invoice is due on 4/13/2024

Epting & Rannik, LLC

46A State Street,

Charleston, SC 29401-

Tel: 843-377-1871 Fax: 843-377-1310

ake@epting-law.com

Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice**Invoice Date:** Mar 14, 2024**Invoice Num:** 1630**Billing Through:** Dec 31, 2023**In Reference To:** Nautilus Insurance (2138-001) - Managed by (JGR)**TIMEKEEPER SUMMARY**

Timekeeper	Total Hours	Hourly Rate
Andrew Epting	23.7	\$550.00
Angela Goddard Gross	13.7	\$150.00
Clinton Magill	102.7	\$285.00
Jaan Rannik	190.8	\$285.00
Jonathan Raley	48.3	\$75.00
Rhonda McCraw	5.0	\$175.00

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Invoice**Invoice Date:** May 29, 2024**Invoice Num:** 1638**Billing Through:** Mar 31, 2024**In Reference To:** Nautilus Insurance (2138-001); - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
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REDACTED

1/2/2024	Telephone call with JGR regarding Miller preparation	AKE	0.60	\$330.00
1/2/2024	Email with FCI Jessup Counselors regarding Fleming Deposition and advise JGR; Research procedure for prisoner Deposition at FCI Jessup	JRaley	1.20	\$90.00

REDACTED

1/5/2024	Continue Research on admissibility of prior Trial Testimony at Summary Judgment phase; Email with Jessup Counselors regarding Fleming Deposition; Research procedure for prisoner Deposition at FCI Jessup	JRaley	3.60	\$270.00
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REDACTED

1/6/2024	Email with FCI Jessup Counselor regarding Fleming Deposition	JRaley	0.50	\$37.50
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REDACTED

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Invoice

Invoice Date: May 29, 2024
Invoice Num: 1638
Billing Through: Mar 31, 2024

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
1/9/2024	Conference with Raley regarding Fleming Deposition logistics; Research UTPA claims	JGR	0.60	\$171.00
	REDACTED			
1/10/2024	Research Federal Rules of Evidence 904 and Federal Rules of Civil Procedure 32 as to admissibility of Trial Testimony for substantive use in Motion for Summary Judgment; Research SC UTPA to formulate arguments relating to privity as a requirement to assert SC UTPA as a Cause of Action; Call with Clerk of SC Supreme Court regarding any existing transcripts relating to Fleming proceedings with the ODC	JRaley	3.40	\$255.00
1/10/2024	Review SCUTPA and Privity research summary from JRaley; Confer with co-Counsel on same	CTM	0.40	\$114.00
	REDACTED			
1/12/2024	Research regarding UTPA Claim; Follow up with Mocciole regarding email searches	JGR	1.60	\$456.00
1/12/2024	Confer with co-Counsel regarding tweaking SCUTPA and Privity strategy	CTM	0.30	\$85.50
1/15/2024	Research Collateral Estoppel in Attorney Disciplinary Hearing; Continue SC UTPA Research; Review and edit Motion for Summary Judgment per JGR	JRaley	2.20	\$165.00
	REDACTED			
1/15/2024	Review Research summary on Collateral Estoppel applied to Disciplinary Orders	CTM	0.10	\$28.50
	REDACTED			
1/17/2024	Review Gergel charge on Conspiracy and Confer with CTM	AKE	0.70	\$385.00
1/17/2024	Research Court filings for Gergel Jury instruction in Lafitte Trial; Review article regarding Trust account per CTM	AGG	1.00	\$150.00
1/17/2024	Research Model Rules of Professional Conduct; Research Collateral Estoppel applicability to ODC Opinion; Call to Clerk of SC Supreme Court; Email FCI Jessup Counselors regarding Fleming Deposition	JRaley	2.00	\$150.00
1/17/2024	Review Gergel Jury Charges on Conspiracy claims; Revise Motion accordingly	JGR	1.80	\$513.00
	REDACTED			

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
1/18/2024	Confer with JRaley regarding development of Fleming and Estoppel arguments; Draft correspondence regarding Motion to Reconsider	CTM	0.20	\$57.00
1/19/2024	Research Court filings for Transcript of Fleming Plea in State Court; Call SC Court Administration	AGG	0.50	\$75.00
1/19/2024	for Court Reporter contact information; Research Transcript of Laffitte sentencing in Federal Court per CTM			
1/19/2024	Research Fifth Amendment adverse inference also considered when contemporaneously found within applicable Opinions discovered throughout original Research; Targeted Westlaw, Bloomberg, Lexis Research for circumstances where Conspiracy has been charged to a jury before Judge Gergel	JRaley	2.60	\$195.00
1/19/2024	Revise Motion and send draft to Client with update; Research Gergel Jury Instructions	JGR	6.20	\$1,767.00
1/19/2024	Confer with JGR on Motion strategy; Confer with AGG regarding transcripts and other documents needed to flesh out Fleming disciplinary findings for use in Estoppel arguments	CTM	0.40	\$114.00
1/21/2024	Review series of correspondence regarding Fleming Deposition	CTM	0.10	\$28.50
1/22/2024	Prepare Request for Transcript of Cory Fleming Plea Hearing; telephone to Court Administration; Email to Court Administration; conference with JGR	AGG	0.30	\$45.00
REDACTED				
1/22/2024	Review series of correspondence regarding potential Motion to Reconsider and Fleming Deposition; Review Moss & Khun documents regarding Hennegar Insurance claim; Draft summary of relevant considerations regarding same and ongoing case strategy development	CTM	0.30	\$85.50
REDACTED				

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
1/23/2024	Research Rule 29 abrogate any conflict between Rule 28(a)(1) and Rule 30(b)(5)(a) as it relates to conducting a deposition before a Court Reporter who may not be present	JRaley	1.00	\$75.00
1/23/2024	Emails regarding email search and production; Revise Motion; Review Transcripts	JGR	3.40	\$969.00
1/23/2024	Review series of correspondence regarding new email searches for Nautilus matter; Conferences with co-Counsel regarding Laffitte sentencing, Fleming Deposition, and general case strategy development	CTM	1.10	\$313.50
REDACTED				
1/24/2024	Receive and index Transcript of Fleming Plea Hearing	AGG	0.20	\$30.00
1/24/2024	Research Circumstantial Evidence to prove State Conspiracy Claim per CTM; Research Agency consideration in Conspiracy claim	JRaley	1.50	\$112.50
1/24/2024	Research 5th Amendment and bindingness of its invocation; Confer with CTM on Conspiracy law; Emails regarding email search and production; Call with Pendarvis regarding Deposition of Fleming; Email to all Counsel regarding same; Prepare for Deposition	JGR	5.80	\$1,653.00
1/24/2024	Confer with co-Counsel regarding privileges applicable to SLED interviews; Research issue of latitude in admission of circumstantial evidence; Review series of correspondence from opposing Counsel regarding Fleming Deposition; Review correspondence from Berkley regarding Nautilus searches; Review series of correspondence regarding Fleming State Hearing Transcript and case-relevant news article; Outline additional facts for potential use in attacking validity of settlement	CTM	0.50	\$142.50
1/25/2024	Draft Notice of Deposition of Fleming and circulate	AGG	0.20	\$30.00
REDACTED				
1/25/2024	Review CTM memo regarding Fleming and comment; Call with CTM	AKE	0.30	\$165.00
REDACTED				
1/25/2024	Communication with Counselor Forsythe regarding Fleming Subpoena Service for Deposition	JRaley	0.50	\$37.50

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
1/25/2024	Revise outline for Fleming Deposition; Follow up with Client regarding email search	JGR	2.20	\$627.00
1/25/2024	Research prior case involving Fleming and Murdaugh alleged to be reverse Satterfield matter and prepare summary; Review series of correspondence regarding Nautilus searches; Confer with JRaley regarding additional issues to Research	CTM	0.40	\$114.00
1/26/2024	Review and file Court Reporter confirmation for Fleming Deposition; Email JGR and Raley	AGG	0.20	\$30.00
1/26/2024	Review and revise Brief; In-depth discussion with JGR regarding way forward	AKE	3.30	\$1,815.00
1/26/2024	Call with Counselor Forsyth regarding Deposition Notice; Provide Notice of Deposition and Subpoena	JRaley	0.20	\$15.00
1/26/2024	Review CTM memo and attachments regarding "Reverse Satterfield/Fleming"	JRaley	1.00	\$75.00
1/26/2024	Draft email update to Client; Emails regarding email search; Confer with AKE on Brief strategy; Circulate Fleming Deposition Notice; Download email production and confer with RHM regarding processing	JGR	2.00	\$570.00
1/26/2024	Review series of correspondence regarding use of reverse Satterfield facts, brief update, and Deposition confirmation for 2/14	CTM	0.20	\$57.00

REDACTED

1/31/2024	Initial review of supplemental Emails from Nautilus for production; Login to Nebula and Email to Case Manager for uploading instructions; Upload Emails to Nebula	RHM	0.40	\$70.00
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REDACTED

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	REDACTED			
2/1/2024	Begin review and tagging of recently uploaded Claims File Emails in Nebula	RHM	2.50	\$437.50
	REDACTED			
2/2/2024	Research Interlocutory Appeal issues, Conspiracy involving appearance of arms-length insurance transaction; Analyze prior Order denying Fleming and M&K Defendants regarding considering scope and capacity issues	CTM	0.40	\$114.00
	REDACTED			
2/5/2024	Telephone call with Pendarvis regarding Fleming Deposition; Prepare for same; Research Appealability	JGR	3.80	\$1,083.00
2/5/2024	Research Federal Court Rules relating to preservation of arguments for appeal; Research State law conspiracy and agent/agency "once a part of the conspiracy your acts are part of everyone else's"; Further review of Honorable Ralph King Anderson Jury Charge Book, Chapter 12, Civil Conspiracy, in anticipation opposing Dispositive Motions	JRaley	3.20	\$240.00
2/5/2024	Confer with JGR regarding Fleming and Fifth Amendment	CTM	0.20	\$57.00
2/6/2024	Nebula search of supplemented Nautilus Emails - Phelps	RHM	3.40	\$595.00
2/6/2024	Continue preparations for Fleming Deposition; Research 5th Amendment issues	JGR	4.40	\$1,254.00
	REDACTED			

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
2/7/2024	Research file for Plea Agreement of Fleming per JGR; Communications with Grand Jury Clerk; Confer with JGR	AGG	0.50	\$75.00
2/7/2024	Review memo regarding Briefing; Call with JGR regarding PNC duty Fleming withdrawing taking 5th	AKE	0.40	\$220.00
2/7/2024	Revise Motion to Enforce Laffitte Subpoena; Call with Gressette regarding Discovery; Call with Khan regarding Miller status and Deposition circulate Laffitte Subpoena; Review Fleming Plea, Notice of Appeal, and Prepare for Deposition; Review Testimony from past proceedings	JGR	8.20	\$2,337.00

REDACTED

2/8/2024	Email Court Reporter providing Counselor Forsyth contact information	AGG	0.20	\$30.00
2/8/2024	Prepare for Fleming Deposition; Write Pendarvis regarding 5th Amendment Position; Confer with CTM regarding Appeal Question	JGR	3.00	\$855.00

REDACTED

2/9/2024	Call with JGR regarding Fleming and pleading the 5th; Discussion of substance of examination of Fleming	AKE	0.30	\$165.00
2/9/2024	Prepare for Fleming Deposition; Call with Gressette regarding Miller Deposition; Confer with AGG on Laffitte Subpoena and Service	JGR	4.20	\$1,197.00

REDACTED

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
2/12/2024	Emails to/from Process Server; Communications with Counselor Forsyth regarding Fleming Deposition Exhibits; Conference with JGR; Assemble and prepare Exhibits for Fleming Deposition; Email to court reporter regarding Exhibits	AGG	1.00	\$150.00
2/12/2024	Prepare for Fleming Deposition; Identify Exhibits for same	JGR	5.20	\$1,482.00
2/12/2024	Analyze Probate FOIA file and compare varying versions of disbursements from settlements; Review Westendorf accountings submitted to Probate Court for discrepancies; Confer with co-Counsel on same and additional research needed for case	CTM	0.60	\$171.00
2/13/2024	Receive and calendar Zoom link for Deposition of Fleming; Email counsel circulating same	AGG	0.20	\$30.00
2/13/2024	Telephone call with JGR regarding preparation for Fleming and pleading the 5th	AKE	0.30	\$165.00
2/13/2024	Prepare for Fleming Deposition; Call with Briggs regarding Discovery status	JGR	6.60	\$1,881.00
2/13/2024	Supplement and revise Fleming deposition outline; Confer with co-Counsel on same	CTM	2.10	\$598.50
2/14/2024	Email to all Counsel circulating Exhibits to Fleming Deposition; Upload Exhibits to Court Reporter; and Email regarding Real Time Transcript	AGG	0.30	\$45.00
REDACTED				
2/14/2024	Prepare for and attend Fleming Deposition; Confer with AKE; Update to Client; Research Rule 56(d), Election of Remedies, Cross Motions for Summary Judgment; Email Long regarding Grantland Affidavit	JGR	7.40	\$2,109.00
REDACTED				
2/14/2024	Research prior Gergel cases for Opinions addressing election of remedies	JRaley	4.40	\$330.00
2/14/2024	Attend telephone Deposition of Fleming in supporting role for co-Counsel; Confer with co-Counsel on election of remedies Opinion from Gergel and strategy before and after Fleming testimony; Review correspondence from Counsel for Defendant M&K regarding Deposition of Fleming	CTM	4.50	\$1,282.50
REDACTED				

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2/15/2024	Telephone calls, emails with Haseldon, Bethea regarding Laffitte Deposition; Call with Long regarding Grantland Affidavit; Review Grantland-Fleming correspondence; Email Pendarvis regarding Fleming Discovery	JGR	3.20	\$912.00
2/15/2024	Review series of correspondence regarding Murphy & Grantland follow-up from its Counsel and noticing Laffitte Deposition from his Counsel; Confer with co-Counsel regarding same and obtaining updated Discovery from Fleming in light of 5th Amendment change in position	CTM	0.50	\$142.50
REDACTED				
2/16/2024	Review series of correspondence regarding Fleming Discovery updates; Confer with co-Counsel on same as well as Fleming's own requests	CTM	0.60	\$171.00
2/19/2024	Emails with Briggs regarding Murphy Grantland; Emails with Pendarvis, Long regarding Grantland Deposition; Confer with AKE	JGR	0.80	\$228.00
2/19/2024	Brief Research of election of remedy Opinion by Gergel; Review series of correspondence regarding ongoing discussion of Fleming Discovery issues; Confer with co-Counsel regarding same, M&K's Counsel, and latest on Laffitte	CTM	0.50	\$142.50
2/20/2024	Receive and index rough draft of Transcript of Fleming Deposition; Communications to Counselor Bethea, all Counsel, and Process Server; Prepare revised Subpoena to Laffitte; Confer with JGR	AGG	0.50	\$75.00
2/20/2024	Review Fleming Deposition Transcript; Emails with Counsel regarding Laffitte Deposition; Amend Subpoena	JGR	0.60	\$171.00
2/20/2024	Review series of correspondence with Laffitte Counsel regarding discussing Deposition of Client; Confer with co-Counsel regarding Fleming transcript and message received from PSB Counsel	CTM	0.30	\$85.50

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
2/21/2024	Review email searches; Confer with AGG regarding Fleming Discovery; Emails with Counsel regarding Discovery; Strategize regarding Laffitte Deposition REDACTED	JGR	4.40	\$1,254.00
2/22/2024	Emails with Counsel regarding Service of Laffitte Subpoena; Revise Notice; Prepare for Deposition; Emails with Pendarvis regarding Grantland Deposition; Call with prison official regarding Service of Laffitte Subpoena	JGR	1.80	\$513.00
2/22/2024	Review series of correspondence with Counsel for Fleming regarding Grantland Deposition; Confer with co-Counsel regarding same; Review series of correspondence with Counsel for Laffitte regarding Deposition REDACTED	CTM	0.30	\$85.50
2/23/2024	Review correspondence from Counsel for Fleming regarding Grantland Deposition; Review notes from Fleming Deposition regarding statements as to Grantland agreements regarding Order	CTM	0.20	\$57.00
2/26/2024	Receive and index Deposition Transcript and Exhibits of Fleming REDACTED	AGG	0.20	\$30.00
2/27/2024	Call with Briggs regarding Murphy Grantland, Discovery status; Call to Long regarding Grantland Deposition; Call with Khan regarding Amy Miller status	JGR	1.60	\$456.00
2/27/2024	Conference with co-Counsel regarding next steps looking forward to Motion deadline REDACTED	CTM	0.20	\$57.00
2/28/2024	Emails regarding Laffitte, Grantland Depositions	JGR	0.40	\$114.00

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2/28/2024	Research potential Estoppel arguments with regard to Statute of Limitations Defenses; Review correspondence from Fleming Counsel regarding Deposition of Grantland	CTM	0.50	\$142.50
REDACTED				
3/1/2024	Prepare Cross Notice of Deposition of Grantland; Finalize AKE letter to Briggs; Emails to/from Counselor Bethea regarding Exhibits and dial-in instructions; Conference with JGR regarding Affidavit of Service and Exhibits to Laffitte Deposition	AGG	0.30	\$45.00
3/1/2024	Finalize Counter Notice of Deposition of Grantland; Outline Laffitte Deposition; Research Waiver of 5th Amendment Rights; Revise letter to Briggs regarding Murphy Grantland	JGR	4.60	\$1,311.00
REDACTED				
3/1/2024	Review series of correspondence regarding Grantland and protection request	CTM	0.20	\$57.00
REDACTED				
3/4/2024	Review correspondence from Counsel for Fleming regarding Grantland Deposition; Review Forge checks and compare signatures with those from prior cases	CTM	0.20	\$57.00
REDACTED				

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REDACTED				
3/6/2024	Research Caselaw related to personal representative's status as an officer of the Court and reliance of interested non-parties in connection with proceedings; Review correspondence regarding Depositions of Laffitte and Grantland	CTM	2.00	\$570.00
REDACTED				
3/8/2024	Prepare for and attend Laffitte Deposition; Review Nautilus Emails for Production; Call with Gressette regarding Production; Emails with Client regarding emails	JGR	5.20	\$1,482.00
REDACTED				
3/11/2024	Prepare for Grantland Deposition	JGR	3.40	\$969.00
3/11/2024	Analyze additional e-mails from latest Nautilus document searches and consider potential impact and new information contained in same; Confer with co-Counsel regarding notable e-mails from latest Nautilus searches; Review series of correspondence regarding PSB request for audio recording referenced in Nautilus documents; Review correspondence from Counsel for Westendorf regarding Grantland deposition	CTM	1.50	\$427.50
3/12/2024	Receive and index Deposition Transcript of Laffitte; Receive and index Westendorf proposed Exhibits for Grantland Deposition; Email to Pendarvis paralegal for exhibit link; Draft Nautilus Responses to PSB 3rd Requests for Production; Conference with JGR; Prepare Dropbox link for Production and serve all Counsel	AGG	1.00	\$150.00
3/12/2024	Conference with JGR regarding Deposition prep; Review Deposition Exhibits; Confer with CTM regarding strategy for Summary Judgment	AKE	1.40	\$770.00

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Professional Services

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3/12/2024	Prepare for and attend Grantland Deposition; Review additional Emails for production and prepare same for Production; Emails and calls to Briggs regarding Emails and Grantland Deposition	JGR	6.80	\$1,938.00
3/12/2024	Final preparation for and attend Deposition of Grantland as Counsel for Nautilus	CTM	6.10	\$1,738.50
REDACTED				
3/13/2024	Prepare materials for production; Email same to Briggs; Draft responses to Fleming Discovery; Recast Summary Judgment argument as Motion for Declaration; Research same	JGR	6.20	\$1,767.00
3/13/2024	Confer with JGR regarding final Discovery	CTM	0.20	\$57.00
3/14/2024	Revise Fleming Discovery Responses	JGR	1.80	\$513.00
3/14/2024	Supplement and revise draft Responses to Fleming Discovery Requests	CTM	0.40	\$114.00
3/15/2024	Finalize Discovery Responses to Fleming; Revisions to Summary Judgment Brief; Review Fleming Production; Confer with CTM regarding potential objections to Fleming Responses	JGR	6.00	\$1,710.00
3/15/2024	Extract documents from Fleming Production; Revisions to Nautilus Response to Fleming Requests for Production; Research Production history; Confer with JGR; Serve Nautilus Response on all Parties	AGG	1.00	\$150.00
3/15/2024	Conferences with co-Counsel finalizing Fleming responses and supplementing service	CTM	0.30	\$85.50
3/18/2024	Research and revisions to Summary Judgment Motion	JGR	2.40	\$684.00
REDACTED				
3/19/2024	Research updates to SC Rules of Civil Procedure 43(k) and purpose of same	CTM	0.20	\$57.00
3/19/2024	Revise Brief; Call with Khan regarding potential Miller Affidavit	JGR	1.80	\$513.00
3/20/2024	Prepare revisions to Brief, outline strategy regarding Declaratory Judgment; Research Agency and Personal Representative law regarding Vicarious Liability	AKE	6.30	\$3,465.00
3/20/2024	Revise Brief; Confer with AKE regarding strategy	JGR	4.20	\$1,197.00
3/20/2024	Supplement portions of Motion for Summary Judgment Brief; Research Right of interested parties to rely on officer of the court; Confer with co-Counsel regarding same	CTM	0.80	\$228.00

Epting & Rannik, LLC

46A State Street,
Charleston, SC 29401-
Tel: 843-377-1871 Fax: 843-377-1310
ake@epting-law.com

Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: May 29, 2024
Invoice Num: 1638
Billing Through: Mar 31, 2024

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
3/21/2024	Email to Briggs with draft Motion; Confer with AKE regarding Borrowed Servants; Research Partial Summary Judgment standards and Election of Remedy considerations	JGR	4.40	\$1,254.00
REDACTED				
3/22/2024	Research and revise Brief	JGR	3.80	\$1,083.00
REDACTED				
3/25/2024	Review file, assemble and prepare Exhibits to Motion for Summary Judgment per JGR	AGG	5.00	\$750.00
3/25/2024	Research and revisions to Brief; Confer with AGG regarding Exhibits	JGR	5.80	\$1,653.00
3/25/2024	Research UCC Statutory and/or Fiduciary duty and/or related code to check fraud	JRaley	1.40	\$105.00
3/25/2024	Draft and supplement substantive portions of argument for draft Motion for Summary Judgment; Confer with JGR regarding ongoing strategy development Motion; Review Murdaugh pleadings regarding compiling key admissions for Brief; Research seeking cases wherein partial Summary Judgment was used to declare agreement void, co-Agency law for use in tying Murdaugh to Westendorf, and Fifth Amendment Waivers	CTM	4.30	\$1,225.50
3/26/2024	Revise Brief	JGR	4.20	\$1,197.00
3/26/2024	Draft and supplement new portions of Motion for Partial Declaration and/or Summary Judgment; Research requirements for PR Bond in SC and other issues relevant to drafting Motion arguments; Confer with co-Counsel regarding reverse Satterfield case involving Murdaugh and Fleming and how best to use same in Motion arguments	CTM	2.20	\$627.00
3/27/2024	Receive and index Grantland Deposition Transcript and Exhibits	AGG	0.20	\$30.00
3/27/2024	Review research regarding Declaratory Judgment; Revise Brief; Confer with JGR on strategy and possible relief	AKE	3.70	\$2,035.00
REDACTED				

Epting & Rannik, LLC

46A State Street,
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 Tel: 843-377-1871 Fax: 843-377-1310
 ake@epting-law.com

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 Scottsdale, AZ 85260

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Invoice Date: May 29, 2024

Invoice Num: 1638

Billing Through: Mar 31, 2024

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

Date	Description	Employee	Hours	Amount
3/27/2024	Continue supplementing and developing arguments in Motion for Partial Summary Judgment; Analyze article on Murdaugh flunking lie detector and impact of same on plea deal; Research industry standards for banks requiring employees to refuse to serve as personal fiduciaries for bank clients and requiring all employees to be bonded; Research regarding additional ethics opinions relevant to Fleming arguments; Confer with co-Counsel on election of remedy topics in connection with declaratory judgment arguments	CTM	3.30	\$940.50
3/28/2024	Prepare Deposition Notebook	AGG	0.50	\$75.00
3/28/2024	Research vicarious liability and prep Brief regarding Release of escrow and fault	AKE	3.50	\$1,925.00
3/28/2024	Revise Brief; Call with Briggs regarding same	JGR	5.60	\$1,596.00
3/28/2024	Continue supplementing and developing arguments in Motion for Partial Summary Judgment; Research seeking support for potential argument that PR duties were non-delegable; Confer with co-Counsel regarding criminal implications of Westendorf bank representations in Probate application; Analyze all Murdaugh guilty pleas and underlying indictment counts to identify best of same to highlight in our Motion	CTM	2.80	\$798.00
3/29/2024	Revise Brief to include cites to Exhibits	AGG	2.50	\$375.00
3/29/2024	Research and revise Brief; Calls with AKE regarding Brief	JGR	8.20	\$2,337.00
3/29/2024	Research Returning to Status Quo, Questions of Law Determined at Summary Judgment stage, Cross-Motion for Summary Judgment for use in Nautilus Motion for Summary Judgment filing	JRaley	2.40	\$180.00
3/29/2024	Continue supplementing and developing arguments in Motion for Partial Summary Judgment; Analyze Murdaugh plea transcript in State Court regarding financial crimes; Confer with co-Counsel on best pleas and indictments as to Murdaugh for use in Motion; Analyze PSB Regulatory filings and disclosures from 2018-2019 seeking information contradicting theory that PSB does not provide fiduciary services to clients and identifying accrual for "possible legal settlement"	CTM	3.10	\$883.50
3/30/2024	Revise Brief	JGR	8.80	\$2,508.00
3/30/2024	Review last rough draft of Brief; Prepare notes; Call with JGR	AKE	1.80	\$990.00
3/30/2024	Westlaw research of Compensatory Damage award(s) in connection with the rescission of a contract and/or return of parties to the "status quo" in relation to Motion for Partial Summary Judgment	JRaley	2.80	\$210.00

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Invoice

Invoice Date: May 29, 2024
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Billing Through: Mar 31, 2024

In Reference To: Nautilus Insurance (2138-001i) - Managed by (JGR)

Professional Services

Date	Description	Employee	Hours	Amount
3/31/2024	Revise Brief and prepare Exhibits	JGR	6.40	\$1,824.00

REDACTED

For Professional Services Rendered:

422.60

\$115,765.00

Additional Charges

Date	Description	Amount
1/9/2024	#1807 KLDISCOVERY Inv. 1001000006659 Nebula Hosting (Nov 2023)	\$240.00
1/17/2024	#1811 KLDISCOVERY Inc. 1001000010840 Nebula Hosting (Dec 2023)	\$240.00
1/24/2024	#1819 Frances B Ray, Court Reporter - Transcript of Fleming Plea Hearing in State Court	\$49.00

REDACTED

2/20/2024	#1830 KLDISCOVERY Inv. 1001000014822 Nebula Hosting (Jan 2024)	\$351.00
2/29/2024	#1836 Clark Bolen Rough Draft 02/14/2024 Deposition Transcript Cory Fleming (Inv. 61781)	\$797.60
3/14/2024	#1840 KLDISCOVERY Inv. 1001000019993 (Feb 2024)	\$359.50

REDACTED

3/28/2024	#1845 AdvancedOne - Deposition Transcript John Grantland taken 03/12/2024 (Inv. 778028)	\$1,277.35
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Total Costs:	\$3,897.70
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Total Amount of this Bill:	\$119,662.70
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Previous Balance:	\$0.00
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Balance Due:	\$119,662.70
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This invoice is due on 6/28/2024

TIMEKEEPER SUMMARY

Timekeeper	Total Hours	Hourly Rate
Andrew Epting	41.4	\$550.00
Angela Goddard Gross	21.0	\$150.00
Clinton Magill	73.9	\$285.00

Epting & Rannik, LLC

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Invoice

Invoice Date: May 29, 2024

Invoice Num: 1638

Billing Through: Mar 31, 2024

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

TIMEKEEPER SUMMARY

Timekeeper	Total Hours	Hourly Rate
Jaan Rannik	222.1	\$285.00
Jonathan Raley	57.5	\$75.00
Rhonda McCrow	6.7	\$175.00

Epting & Rannik, LLC

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John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: Oct 10, 2024
Invoice Num: 1668
Billing Through: Jun 30, 2024

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
4/1/2024	Review and index Moss & Kuhn Motion for Summary Judgment; Research Murdaugh Federal Sentencing Hearing; Confer with JGR; Research Fleming Indictments; E-File Nautilus Motion for Summary Judgment	AGG	1.50	\$225.00
4/1/2024	Research and finalize Brief and Exhibits; Emails with Counsel regarding confidential Exhibits and draft Motion to File under Seal	JGR	9.60	\$2,736.00
4/1/2024	Supplement and revise Motion for Summary Judgment and assist with final exhibits; Analyze Motions filed by Defendants Moss & Kuhn and Fleming and review questionable cases cited; Begin outlining summary of arguments and potential rebuttals to their arguments; Confer with co-Counsel regarding initial response strategy	CTM	9.50	\$2,707.50
4/2/2024	Review Moss & Kuhn Summary Judgment Brief; Confer with CTM regarding State Bonding Requirement	AKE	2.20	\$1,210.00
4/2/2024	Review Defendants' Briefs; Research regarding same	JGR	5.50	\$1,567.50
REDACTED				
4/3/2024	Review Fleming Brief and outline for discussions with JGR	AKE	2.70	\$1,485.00
4/3/2024	Review Briefs and Research; Begin outlining Miller Affidavit; Email Pendarvis regarding Exhibits and review same	JGR	6.00	\$1,710.00
4/3/2024	Review new opinion from Supreme Court discussing circumstantial evidence; Draft substantive analysis of how same is helpful for shaping our Motion for Summary Judgment arguments and confer with co-Counsel on same; Analyze Murdaugh Motion for Default as to himself	CTM	1.50	\$427.50
REDACTED				
4/4/2024	Review Briefs; Strategize regarding responses; Confer with AGG on Restitution Order	JGR	2.40	\$684.00
4/4/2024	Research law to rebut Defendants' suggestion that knowledge of counsel hired by insurer to defend insured is imputed to insurer and conflation of Statute of Limitation theory with assumption of the risk; Outline potential hearsay argument to rebut various factual assertions by Defendants	CTM	1.10	\$313.50

Epting & Rannik, LLC

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Invoice

Invoice Date: Oct 10, 2024

Invoice Num: 1668

Billing Through: Jun 30, 2024

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
4/5/2024	Review Briefs; Call with Briggs regarding Briefs	JGR	1.30	\$370.50
REDACTED				
4/10/2024	Research and draft Summary Judgment Oppositions	JGR	8.20	\$2,337.00
4/10/2024	Research regarding Statute of Limitations and circumstantial evidence cases to include in response to Defendants' Motions; Confer with co-Counsel regarding findings	CTM	0.50	\$142.50
4/11/2024	Call with Moccioia regarding M&G; Research and draft Opposition to Moss & Kuhn, Fleming Motions	JGR	5.80	\$1,653.00
REDACTED				
4/12/2024	Revise Opposition Briefs; Revise Miller Affidavit; Review Murdaugh Federal Sentencing Transcript	JGR	7.00	\$1,995.00
4/12/2024	Draft negligence arguments for response and Research related to potential collusion angle	CTM	3.60	\$1,026.00
REDACTED				
4/15/2024	Research and revise Briefs	JGR	1.40	\$399.00
4/15/2024	Continue research and drafting portions of argument for response to Defendants' Motion	CTM	3.00	\$855.00
4/16/2024	Revise Briefs; Emails with Counsel regarding deadlines	JGR	4.80	\$1,368.00

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Invoice Date: Oct 10, 2024

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Billing Through: Jun 30, 2024

In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
4/16/2024	Continue supplementing draft responses to Defendants' Motions REDACTED	CTM	1.10	\$313.50
4/17/2024	Revise Briefs; Outline Miller Affidavit	JGR	6.60	\$1,881.00
4/17/2024	Analyze new published 4th Circuit Opinion involving RICO conspiracy and summarize key parts for co-Counsel; Review correspondence from opposing counsel; Confer with JGR regarding Miller Affidavit	CTM	0.70	\$199.50
4/18/2024	Receive and index Motion to Amend Scheduling Order and proposed Consent Amended Scheduling Order	AGG	0.20	\$30.00
4/18/2024	Research Co-Conspirator to fraud liable for actions of Conspirators	JRaley	1.00	\$75.00
4/18/2024	Emails regarding Scheduling Order REDACTED	JGR	0.20	\$57.00
4/19/2024	Receive and index Fifth Amended Scheduling Order REDACTED	AGG	0.20	\$30.00
4/23/2024	Review and edit final version of Brief and Miller Affidavit; Confer with JGR	AKE	2.80	\$1,540.00
4/23/2024	Research Causes of Action; Review and revise Oppositions to Motions for Summary Judgment	JGR	4.20	\$1,197.00

Epting & Rannik, LLC

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John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice

Invoice Date: Oct 10, 2024

Invoice Num: 1668

Billing Through: Jun 30, 2024

In Reference To: Nautilus Insurance (2138-001); Managed by (JGR)

Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
	REDACTED			
4/24/2024	Review and revise Fleming Opposition	AKE	2.30	\$1,265.00
4/24/2024	Revise Briefs; Research regarding RICO	JGR	6.40	\$1,824.00
	REDACTED			
4/25/2024	Revise Briefs	JGR	7.00	\$1,995.00
	REDACTED			
4/26/2024	Assemble Exhibits; Citing to Exhibits; E-file Motion for Leave to File Excess Pages	AGG	3.00	\$450.00
4/26/2024	Revise Briefs	JGR	8.80	\$2,508.00
4/26/2024	Continue research supplementing response arguments; Continue drafting and supplementing draft response	CTM	11.50	\$3,277.50
4/27/2024	Revise Briefs	JGR	4.80	\$1,368.00
	REDACTED			
4/28/2024	Revise Briefs	JGR	6.20	\$1,767.00
	REDACTED			
4/29/2024	Assemble Exhibits; Citing to Exhibits; Conferences with JGR; Review and file Test Order Granting Motion for Leave to File Excess Pages	AGG	4.60	\$690.00
4/29/2024	Revise Briefs	JGR	9.20	\$2,622.00
4/29/2024	Supplement and revise draft of Amy Miller Affidavit for use in Summary Judgment Motion briefing; Continue drafting and supplemental Response to PSB and Westendorf Motions	CTM	6.90	\$1,966.50
4/30/2024	Continue assembling Exhibits; Citing to Exhibits	AGG	1.80	\$270.00
4/30/2024	Research lack of knowledge of the precise identity of party to be harmed not required for civil conspiracy claim, circumstantial evidence to prove knowledge, and direct liability for indirect participation in RICO scheme	JRaley	4.00	\$300.00
4/30/2024	Revise Briefs; Call with A. Miller regarding Affidavit and finalize same	JGR	9.00	\$2,565.00
4/30/2024	Draft and supplement portions of response to Defendant Moss & Kuhn and Fleming Motions	CTM	2.50	\$712.50

Epting & Rannik, LLC

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In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

Date	Description	Employee	Hours	Amount
5/1/2024	Prepare exhibits; Revisions to Briefs; Conferences with JGR regarding citations; E-file Briefs; Review and index Briefs in Opposition to Nautilus Motion for Summary Judgment; E-file Motion to File Exhibits Under Seal; Email to Judge Gergel	AGG	8.40	\$1,260.00
5/1/2024	Finalize and file Briefs and Exhibits	JGR	13.90	\$3,961.50
5/1/2024	Supplement and execute final revisions to response to all Defendants' Motions; Review Grantland depositions for excerpts for potential use in response or to address as cited by Fleming; Review PSB Email production for any additional evidence to attach to responses and place in record	CTM	11.60	\$3,306.00
5/2/2024	Prepare letter and courtesy copy to Gergel of Responses in Opposition; Prepare tabbed Notebook	AGG	0.30	\$45.00
5/2/2024	Review Defendants' Oppositions to our Summary Judgment Motion; Outline response	JGR	1.20	\$342.00
5/3/2024	Review Briefs and confer with AKE; Email to Client with update REDACTED	JGR	0.80	\$228.00
5/7/2024	Review Opposition Briefs; Confer with AKE and outline responses	JGR	6.60	\$1,881.00
5/7/2024	Research related to development of Reply arguments	CTM	0.80	\$228.00
5/8/2024	Draft outline of Reply Briefs	JGR	4.00	\$1,140.00
5/8/2024	Continue additional Research in support of Reply arguments	CTM	1.70	\$484.50
5/9/2024	Draft portions of substantive arguments for Nautilus Reply	CTM	2.30	\$655.50
5/9/2024	Telephone call with JGR regarding strategy on omnibus Reply	AKE	0.70	\$385.00
5/9/2024	Research and revisions to Reply Brief	JGR	5.80	\$1,653.00
5/10/2024	Prepare index of Fleming Guilty Plea of counts related to Indictment 2022-GS-47-02; Email to CTM and JGR; Review and file Motion for Extension and Order Granting Extension	AGG	0.70	\$105.00
5/10/2024	Continue drafting arguments for Reply; Review State v. Price for potential use; Summarize excerpts of Fleming guilty pleas for admission purposes	CTM	6.90	\$1,966.50
5/11/2024	Revise Reply Brief; Emails with Counsel regarding Consent Motion	JGR	4.40	\$1,254.00
5/13/2024	Continue Research to supplement Reply arguments	CTM	0.30	\$85.50
5/14/2024	Receive and index Fleming Reply to [206] Response in Opposition to Motion for Summary Judgment	AGG	0.20	\$30.00
5/14/2024	Prepare revisions to Reply	AKE	0.80	\$440.00
5/14/2024	Revise Reply Brief	JGR	3.60	\$1,026.00

Epting & Rannik, LLC

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John Briggs
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Scottsdale, AZ 85260

Invoice**Invoice Date:** Oct 10, 2024**Invoice Num:** 1668**Billing Through:** Jun 30, 2024**In Reference To:** Nautilus Insurance (2138-001) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
5/14/2024	Supplement and revise Nautilus Reply	CTM	1.00	\$285.00
5/15/2024	Prepare exhibits to Reply in Support; Emails to/from CTM and JGR; Efile Reply in Support; Receive and Index Reply and exhibits by PSB	AGG	0.50	\$75.00
5/15/2024	Finalize and file Reply	JGR	6.40	\$1,824.00
5/15/2024	Supplement and execute revisions to Nautilus Reply in anticipation of filing; Research relating to same; Assist with key exhibits and cites to prior exhibits already in Record	CTM	5.00	\$1,425.00
5/16/2024	Analyze Reply filed by Fleming and confer regarding same	CTM	0.80	\$228.00
5/17/2024	Prepare Dropbox link with Summary Judgment Motions, Oppositions, Replies, and all supporting exhibits	AGG	0.30	\$45.00
6/18/2024	Review and file Order and Opinion on Various Motions; conference with JGR	AGG	0.20	\$30.00
6/18/2024	Review opinion regarding Summary Judgment Motions; Research same	JGR	1.60	\$456.00
6/23/2024	Review latest draft of Brief; Review emails of Client; Call with JGR	AKE	0.80	\$440.00

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
-------------	--------------------	-----------------	--------------	---------------

REDACTED

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
4/17/2024	#1865 KLDISCOVERY Inv. 1001000023697 (Mar 2024)	\$270.00
4/17/2024	#1868 Lisa D Smith, Court Rprtr - Transcript Murdaugh Federal Sentencing04/01/2024 (Inv. 20240178)	\$202.10
5/15/2024	#1885 KLDISCOVERY Inv. 1001000028107 (Apr 2024)	\$270.00
6/12/2024	#1901 KLDISCOVERY Inv. 1001000031223 (May 2024)	\$270.00

For Professional Services Rendered:

391.20 \$108,936.00

Total Costs: \$1,012.10

Total Amount of this Bill: \$109,948.10

Epting & Rannik, LLC

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In Reference To: Nautilus Insurance (2138-001) - Managed by (JGR)

Previous Balance: \$0.00

Balance Due: **\$109,948.10**

This invoice is due on 11/9/2024

TIMEKEEPER SUMMARY

Timekeeper	Total Hours	Hourly Rate
Andrew Epting	31.8	\$550.00
Angela Goddard Gross	23.8	\$150.00
Clinton Magill	110.6	\$285.00
Jaan Rannik	188.0	\$285.00
Jonathan Raley	37.0	\$75.00

Epting & Rannik, LLC

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 ake@epting-law.com

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Invoice**Invoice Date:** Jan 15, 2025**Invoice Num:** 1690**Billing Through:** Jan 8, 2025**In Reference To:** Nautilus Insurance (2138-001:) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
7/1/2024	Revise Motion for Reconsideration and provide to Client; Discuss Trial timeline and Westendorf appearance; Prepare for Trial	JGR	0.80	\$228.00
7/2/2024	Review final Brief	AKE	1.10	\$605.00
7/2/2024	Finalize and Efile Motion for Reconsideration	JGR	5.40	\$1,539.00
REDACTED				
7/10/2024	Review filed and final Motion to Reconsider	AKE	0.70	\$385.00
REDACTED				
7/25/2024	Finalize Consent Motion and Proposed Order to Extend Time to Reply to Defendants' Responses to Motion for Reconsideration and file with USDC; Email proposed Order to Judge Gergel; Download Text Order Granting Extension	GLM	0.40	\$70.00
7/31/2024	Review filings and outline Reply; Motion to Extend Time to File	JGR	2.80	\$798.00
8/1/2024	Research and begin draft of Reply Brief	JGR	4.60	\$1,311.00
8/2/2024	Revisions to Reply Brief	JGR	5.40	\$1,539.00
8/5/2024	Prepare and Efile Motion to Extend Reply Deadline for Motion to Reconsider	GLM	0.20	\$35.00
8/5/2024	Draft Motion for Extension due to Tropical Storm; Emails with Counsel regarding extension; Revise Reply Brief	JGR	1.60	\$456.00
8/6/2024	Revise Reply Brief; Confer with CTM regarding organization of Brief	JGR	2.20	\$627.00
8/7/2024	Revisions to Reply Brief	JGR	1.40	\$399.00
8/8/2024	Continue revisions to Reply Brief	JGR	5.00	\$1,425.00
8/9/2024	Continue revisions to Reply Brief	JGR	1.60	\$456.00
8/12/2024	Revise Reply Brief	JGR	4.40	\$1,254.00
8/13/2024	Finalize Reply Brief	JGR	2.00	\$570.00
8/13/2024	E-file Reply Brief	GLM	0.40	\$70.00
8/13/2024	Review and revise Reply	AKE	1.20	\$660.00

Epting & Rannik, LLC

46A State Street,

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Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice**Invoice Date:** Jan 15, 2025**Invoice Num:** 1690**Billing Through:** Jan 8, 2025**In Reference To:** Nautilus Insurance (2138-001:) - Managed by (JGR)**Professional Services**

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
8/21/2024	Draft proposed Motion and Scheduling Order for Phase2 of Discovery	GLM	0.60	\$105.00
8/21/2024	Review Opinion on Motion to Reconsider; Draft update to Client	JGR	0.80	\$228.00

REDACTED

9/18/2024	Outline and draft Motion to Certify	JGR	1.40	\$399.00
9/19/2024	Confer with JGR and structure outline of Motion	AKE	0.70	\$385.00
9/19/2024	Revise Motion to Certifv: Research same	JGR	4.20	\$1,197.00

REDACTED

9/20/2024	Email with Briggs regarding Motion to Certify; Revisions to same	JGR	0.60	\$171.00
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REDACTED

9/26/2024	Revisions to Motion	JGR	0.40	\$114.00
9/26/2024	Review Certification Motion and revise	AKE	0.40	\$220.00
9/27/2024	Finalize Motion to Certify Appeal; Emails with Counsel conferring regarding same	JGR	1.60	\$456.00
9/27/2024	Prepare for Efiling Motion to Certify to 4th Circuit; File and download Motion with Court	GLM	0.40	\$70.00

;

REDACTED

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
	REDACTED			
10/3/2024	Review and finalize letter to Briggs regarding Gregg Meyers CV	GLM	0.40	\$70.00
	REDACTED			
10/7/2024	Prepare for and attend call with Counsel regarding schedule; Prepare for and attend Status Hearing with Judge Gergel; Review Orders; Draft Discovery Requests	JGR	3.80	\$1,083.00
10/7/2024	Calendar Status Conference deadlines	GLM	0.40	\$70.00
	REDACTED			
10/8/2024	Revise letter to Briggs regarding Meyers	GLM	0.60	\$105.00
10/9/2024	Prepare for call and confer with JGR regarding Trial date and Discovery	AKE	1.00	\$550.00
	REDACTED			
10/9/2024	Finalize letter to Briggs, Email with Meyers CV	GLM	0.20	\$35.00
	REDACTED			
10/15/2024	Emails to/from Infinger regarding Mediation; Calendar conference call with JGR, Briggs and Meyers	GLM	0.40	\$70.00
	REDACTED			
10/16/2024	Coordinate date for Mediation with other parties	GLM	0.60	\$105.00
	REDACTED			
10/17/2024	Follow up email to Counsel for Fleming; Update Infinger regarding same, request a hold date for Mediation	GLM	0.20	\$35.00
	REDACTED			
10/18/2024	Email to all parties regarding Mediation date	GLM	0.20	\$35.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
10/21/2024	REDACTED Emails to/from parties regarding Mediation dates	GLM	0.40	\$70.00
10/21/2024	REDACTED Emails with Counsel, Mediator regarding Mediation dates	JGR	0.30	\$85.50
10/23/2024	REDACTED Coordinate Mediation with Infinger's office	GLM	0.60	\$105.00
10/24/2024	REDACTED Compile and send information for Mediation to Infinger's assistant	GLM	0.40	\$70.00
10/28/2024	REDACTED Research SC Secretary of State for Articles of Incorporation and all amendments for Moss & Kuhn PA; Request Certified copies from SC Secretary of State; Download copies; Calendar hold for Mediation; Download 30(b)(6) Notice of Deposition for Nautilus	GLM	0.60	\$105.00
11/1/2024	REDACTED Upload documents requested by Meyers to Dropbox and provide link	GLM	1.00	\$175.00
11/5/2024	REDACTED Conference with JGR; Memo to Client and revise Mandamus	AKE	1.20	\$660.00
11/7/2024	REDACTED Call with Miller, Khan regarding Deposition, Trial; Emails with Counsel regarding Deposition; Outline Trial Testimony; Outline Summary Judgment Research	JGR	5.00	\$1,425.00

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REDACTED				
11/11/2024	Research SC Court Rosters; SC Secretary of State records; Real Property Tax Records; download Discovery Responses and document production from Counsel for Moss & Kuhn	GLM	1.00	\$175.00
11/12/2024	Prepare for and attend call with Briggs; Discuss strategy with JGR; Prepare letter to Briggs	AKE	1.10	\$605.00
11/12/2024	Telephone calls with Meyers, Briggs; Draft Summary Judgment Motion; Research and review record regarding same	JGR	6.60	\$1,881.00
11/13/2024	Research how to obtain Transcript of Fleming sentencing	GLM	2.00	\$350.00
11/13/2024	Continue drafting Summary Judgment Motion; Emails regarding Deposition dates	JGR	7.20	\$2,052.00
11/14/2024	Revise Fleming Summary Judgment Memorandum	AKE	1.30	\$715.00
11/14/2024	Upload Claims File to Dropbox and provide link to Meyers per request	GLM	0.40	\$70.00
11/14/2024	Email Pendarvis regarding 30(b)(6) Deposition of Nautilus	GLM	0.20	\$35.00
11/14/2024	Research and revise Motion; Review 4th Circuit Opinion regarding Laffitte	JGR	8.20	\$2,337.00
11/15/2024	Revise Motion; Confer with Meyers regarding same; Emails and call with Briggs	JGR	4.80	\$1,368.00
11/18/2024	Trial Preparation; Outline Opening, draft Witness List; Research Local Rules regarding Subpoenas; Outline 26(a)(3) Disclosures; Email Long regarding Grantland testifying	JGR	8.40	\$2,394.00
11/19/2024	Review 4th Circuit Opinion and confer with Magill; Memo to Client	AKE	0.80	\$440.00
11/19/2024	Review Trial Scheduling Order deadlines; Review Gergel Special Instructions for Trial	GLM	0.60	\$105.00
11/19/2024	Telephone calls with Infinger regarding Mediation; Call with Briggs regarding same; Prepare for Trial; Confer with GLM regarding Pretrial deadlines and review Judge Gergel's Special Instructions	JGR	6.20	\$1,767.00
11/20/2024	Review on-line filings to confirm we have all filed pleadings	GLM	0.60	\$105.00
11/20/2024	Prepare for and attend Mediation; Research implications of Confession of Judgment versus Default Judgment	JGR	2.20	\$627.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
11/21/2024	Upload Grantland Deposition Exhibits to Dropbox for Meyers; Draft Trial Subpoena and service letters	GLM	0.40	\$70.00
11/21/2024	Revise Summary Judgment Motion; Draft Request for 12(c) Relief; Research same; Revise Pretrial Disclosures; Emails with Meyers regarding same; Email Long regarding Grantland testifying	JGR	7.80	\$2,223.00
11/22/2024	Trial Preparation; Emails with Meyers regarding Grantland Deposition, Fleming pleas; Revise Summary Judgment Motion and send to Client	JGR	3.20	\$912.00
11/22/2024	Upload Nautilus document production and Estate of Sattelfield production to Dropbox per Meyers	GLM	1.00	\$175.00
11/25/2024	Research regarding adverse inferences against Fleming; Review Research materials from Meyers and revise Motion	JGR	1.00	\$285.00
11/26/2024	Revise Motion; Emails with Briggs regarding same; Confer with Meyers regarding Trial	JGR	1.60	\$456.00
11/26/2024	Compile Motion for Summary Judgment Exhibits	GLM	0.20	\$35.00
11/27/2024	Finalize Motion for Summary Judgment	JGR	1.60	\$456.00
11/27/2024	Review Plaintiff MSH; Revise Motion for Summary Judgment; File Motion for Summary Judgment and exhibits	GLM	0.80	\$140.00
11/29/2024	Prepare for Trial; Outline Miller testimony	JGR	3.80	\$1,083.00
11/30/2024	Trial Preparation; Revise Exhibit List; Emails with Meyers regarding preparation	JGR	4.40	\$1,254.00
12/1/2024	Prepare for Trial; Revise Pretrial Disclosures	JGR	0.60	\$171.00
12/2/2024	Prepare for Trial; Finalize Pretrial Disclosures, Witness list; Review opposing filings	JGR	5.40	\$1,539.00
12/2/2024	Upload hot docs to Dropbox and send link to Meyers; Begin compiling Trial Exhibits; Review 26(a)(3) Pretrial Disclosures and Exhibit list; File both with Court	GLM	2.00	\$350.00
12/3/2024	Telephone calls with Meyers regarding Trial strategy	JGR	0.40	\$114.00
12/3/2024	Download Pretrial Disclosure filings and save to file; Calendar Objection deadline; Revise Pretrial Disclosures and email to Judge Gergel's Case Administrator; Draft letter to Court regarding Notice of case not resolved; Draft Trial Subpoena for Westendorf	GLM	2.00	\$350.00
12/4/2024	Prepare for Trial; Prepare Trial Subpoenas; Research Evidentiary issues	JGR	4.40	\$1,254.00
12/5/2024	Confer with JGR regarding deadlines; Finalize Trial Subpoenas; Prepare cover letters for subpoenas; Research witness mileage fees; Email and mail Trial Subpoenas	GLM	1.20	\$210.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
12/5/2024	Finalize Subpoenas; Strategize and prepare for Trial	JGR	3.20	\$912.00
12/6/2024	Calendar Deposition of Nautilus	GLM	0.20	\$35.00
12/6/2024	Trial preparation; Revise Testimony outline for Miller; Review potential exhibits	JGR	4.80	\$1,368.00
12/9/2024	Update Zoom link for Nautilus Deposition; Follow up with Hampton County Probate Court regarding Certified copies of Petition for Appointment of PR of Satterfield Estate by Westendorf and Order; Call SC State Grand Jury Clerk's office regarding obtaining Certified copies of Fleming indictments and sentence sheets; Calendar updates to deadlines per Judge Gergel's Orders; Download Court filings	GLM	2.00	\$350.00
12/9/2024	Trial preparation; Attend Status Conference/Hearing on Trial, Successor Liability; Report to Client; Call with Client; Draft Pretrial Report	JGR	6.80	\$1,938.00
12/10/2024	Review Order, JGR memos to Client; Confer with JGR	AKE	0.80	\$440.00
12/10/2024	Download multiple Court filings; Request Juror Questionnaire and List from Court; Download filed copy; Draft shell of Objection to Fleming oral Motion to Amend Answer	GLM	1.00	\$175.00
12/10/2024	Draft Objection to Motion to Amend; Draft Reply in Support of 12(c) Motion; Call with Khan regarding Miller in preparation for Deposition; Review claims file ahead of same; Review Order regarding Successor Liability; Outline response, and Research same; Review Fleming Memorandum in Support of Motion to Amend	JGR	5.40	\$1,539.00
12/11/2024	Review Order of Judge Gergel regarding pleadings; Strategize	AKE	0.50	\$275.00
12/11/2024	Download Court filings; Calendar deadlines	GLM	0.40	\$70.00
12/11/2024	Review Fleming Answer, Order from Judge Gergel; Email Briggs regarding same; Prepare Miller for Deposition	JGR	4.40	\$1,254.00
12/12/2024	Draft Affidavit as to Moss & Kuhn phone number; Email Order to JGR; Download Court filings; Begin compiling Defendants' Trial exhibits	GLM	2.00	\$350.00
12/12/2024	Prepare for Deposition; Review Trial exhibits; Revise Pretrial report; Draft Responses to Judge Gergel questions regarding successor liability; Research same; Draft revised Summary Judgment Motion	JGR	7.20	\$2,052.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
12/13/2024	Email missing Trial exhibit list to JGR; Email Fleming Counsel regarding missing Exhibit; Add additional Exhibit to Fleming Trial Exhibit folder; Finalize Plaintiff's Responses to Court questions and file with Court; Proof Motion for Summary Judgment and compile exhibits; File Motion with Court	GLM	1.60	\$280.00
12/13/2024	Prepare for Deposition; Finalize and file Summary Judgment Motion, Response to Judge Gergel's questions regarding successor liability; Revise pretrial report	JGR	6.00	\$1,710.00
12/16/2024	Review pretrial deadlines; Review Trial exhibits; Amend calendar deadlines; Request Certified copies of documents from Hampton County Clerk of Court; Update Trial exhibit list and file Supplemental Exhibits list	GLM	2.00	\$350.00
12/16/2024	Prepare for and attend 30(b)(6) Deposition; Calls with Miller, Briggs regarding same; Review Exhibits and revise Exhibit list; Emails with Counsel regarding date and time to meet and mark Exhibits	JGR	8.40	\$2,394.00
12/17/2024	Strategize Opening Statement and use of Depositions	AKE	0.70	\$385.00
12/17/2024	Assemble binder of Deposition transcripts for Trial; Finalize pretrial report and email to Briggs	GLM	0.80	\$140.00
12/17/2024	Attend meeting to mark Exhibits; Continue Trial prep; Revise Miller Trial Testimony; Report to Clients; Review Deposition Transcripts; Outline Opening Statement	JGR	5.20	\$1,482.00
12/18/2024	Review and revise Trial report; Confer with JGR regarding use of Depositions	AKE	0.70	\$385.00
12/18/2024	Continue Trial prep; Finalize Pretrial report; Revise Opening Statement; Research regarding scope of same; Review standard Jury instructions; Outline proposed instructions	JGR	6.60	\$1,881.00
12/19/2024	Upload Nautilus Trial exhibits to Dropbox for Meyers	GLM	0.20	\$35.00
12/19/2024	Review Order regarding Summary Judgment; Draft Motion in Limine; Revise Testimony outlines	JGR	4.20	\$1,197.00
12/20/2024	Revise Motion in Limine; Research regarding same	JGR	1.80	\$513.00
12/21/2024	Revise Opening Statement and case themes	JGR	1.60	\$456.00
12/23/2024	Download and save multiple pretrial filings; Download Nautilus 30(b)(6) Deposition Transcript and Exhibits; Revise Motion in Limine; Proof final Motion in Limine and efile; Re-order Nautilus Trial Exhibit list; Print Juror Questionnaires create binder	GLM	4.00	\$700.00

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<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
12/23/2024	Prepare for trial; Finalize Motion in Limine; Review Defendants' Motions in Limine; Revise Pretrial Brief; Draft Jury Charge Requests; Review Juror list; Review Deposition Testimony	JGR	11.20	\$3,192.00
12/24/2024	Draft objections to Moss & Khun witness list; Revise Pretrial submittals	JGR	3.80	\$1,083.00
12/26/2024	Combine Fleming and Moss & Kuhn Voir Dire into one document; Highlight Deposition Designations; Draft Nautilus' Deposition Designations; Prepare Pretrial Brief and Exhibits for filing; File final Exhibit list with Court; Prepare emails to Judge Gergel serving Pretrial Brief; Prepare email to all Counsel attaching Pretrial filings	GLM	4.00	\$700.00
12/26/2024	Receive and begin review of USDC Juror Questionnaires to prepare summary	RHM	1.30	\$227.50
12/26/2024	Finalize Pretrial Brief and accompanying materials	JGR	10.20	\$2,907.00
12/27/2024	Call with Prolegal regarding printing and binding Trial exhibits; Create Dropbox link of Exhibits to Prolegal with instructions; Draft cover letter to Judge Gergel for Trial exhibits; Review and revise Nautilus Objections to Fleming and Moss & Kuhn Motions in Limine	GLM	5.00	\$875.00
12/27/2024	Continue review and summary report of USDC Juror Questionnaires	RHM	5.30	\$927.50
12/27/2024	Finalize and file Oppositions to Motions in Limine; Continue Trial prep	JGR	8.40	\$2,394.00
12/28/2024	Continue review and summary report of USDC Juror Questionnaires	RHM	3.40	\$595.00
12/28/2024	Revise Opening Statement; Continue Trial prep	JGR	6.00	\$1,710.00
12/29/2024	Prepare for Trial	JGR	5.40	\$1,539.00
12/30/2024	Review proposed opening; Confer with JGR regarding reading of Depositions; Review Counsel memos	AKE	0.70	\$385.00
12/30/2024	Prepare binder of Moss & Kuhn Exhibits for Meyers; Call with ProLegal regarding Exhibit binders; Review Nautilus Trial Exhibits and compare to Exhibit list; Efile letter to Judge Gergel regarding Trial Exhibits with Court; File Nautilus and Moss & Kuhn Joint Status Report; Create binder of Defendants' marked Exhibits; Send link of Nautilus' binder Exhibits to Defense Counsel; Download recent Court filings	GLM	4.20	\$735.00
12/30/2024	Continue review and summary report of USDC Juror Questionnaires	RHM	4.40	\$770.00
12/30/2024	Prepare for Trial	JGR	9.40	\$2,679.00
12/31/2024	Prepare notes regarding Opening Statement ; Miller Testimony revisions; Confer Trial Order and strategy	AKE	2.20	\$1,210.00
12/31/2024	Download recent Court filings	GLM	0.20	\$35.00

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12/31/2024	Prepare for trial	JGR	6.80	\$1,938.00
1/1/2025	Prepare for trial	JGR	4.80	\$1,368.00
1/2/2025	Continue review and summary report of USDC Juror Questionnaires	RHM	4.60	\$805.00
1/2/2025	Continue Trial prep; Prepare for Pretrial Conference	JGR	8.40	\$2,394.00
1/2/2025	Order original sealed Deposition Transcripts for Depositions of Westendorf, Molinowski, Fleming and Moss & Kuhn; Download recent USDC SC Court filings; Draft Amended Deposition Designations; Create Pretrial Conference binder; Print Second Amended Complaint and related Answers and add to Trial binder; Copy Plaintiff's Exhibits to flash drive for . Meyers	GLM	3.00	\$525.00
1/3/2025	Complete review and summary report of USDC Juror Questionnaires	RHM	5.30	\$927.50
1/3/2025	Strategize regarding Opening Statement and use of Depositions for any purpose	AKE	0.80	\$440.00
1/3/2025	Telephone call with RHM regarding Jury Questionnaires	AKE	0.50	\$275.00
1/3/2025	Prepare for and attend Pretrial Conference; Call with Briggs; Call with C. Allen regarding anticipated Trial timeline and Westendorf appearance; Trial preparation	JGR	11.80	\$3,363.00
1/3/2025	Prepare materials for Pretrial Conference; Highlight Fleming Deposition Designations; Email Meyers regarding same; Print Deposition Designations for Meyers and Court reporter	GLM	2.80	\$490.00
1/4/2025	Strategize regarding Fleming and responsive readings; Call with Meyers	AKE	1.30	\$715.00
1/4/2025	Prepare for Trial	JGR	8.80	\$2,508.00
1/5/2025	Prepare notebook of Juror Questionnaire summaries for use a jury strike	RHM	0.70	\$122.50
1/5/2025	Telephone call with JGR regarding Juror selection	AKE	0.70	\$385.00
1/5/2025	Prepare for Trial	JGR	10.00	\$2,850.00
1/5/2025	Prepare additional Plaintiff's Exhibit binder for Court	GLM	0.60	\$105.00
1/6/2025	Final preparation; Attend Jury selection and Opening Statements	RHM	4.00	\$700.00
1/6/2025	Prepare for and attend Day 1 of Trial including jury selection, Opening Arguments, testimony of Fleming	JGR	12.60	\$3,591.00
1/6/2025	Prepare Nautilus Deposition Designations; Highlight Moss & Kuhn Deposition Designations; Print caselaw for Trial	GLM	1.20	\$210.00
1/7/2025	Conference with Clients and JGR regarding Trial and thoughts on Closing	AKE	1.30	\$715.00
1/7/2025	Prepare for and attend Day 2 of Trial	JGR	14.60	\$4,161.00
1/7/2025	Print Moss & Kuhn Deposition Designations	GLM	0.40	\$70.00

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Employee</u>	<u>Hours</u>	<u>Amount</u>
1/8/2025	Call with JGR regarding Directed Verdict; Confer with Client regarding strategy for form of Verdict and Claims	AKE	2.50	\$1,375.00
1/8/2025	Prepare for and attend Day 3 of Trial; Debrief with Client	JGR	11.40	\$3,249.00
1/8/2025	Download recent on-line filings and docket entries	GLM	0.20	\$35.00
For Professional Services Rendered:			597.30	\$171,012.00

Additional Charges

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/10/2024	#1912 KLDISCOVERY Inv. 1001000036528 (June 2024)	\$270.00
8/13/2024	#1923 KLDISCOVERY Inv. 1001000041555 (July 2024)	\$270.00
9/10/2024	#1933 KLDISCOVERY Inv. 1001000043063 (Aug 2024)	\$270.00
10/10/2024	#1946 KLDISCOVERY Inv. 1001000048927 (Sept 2024)	\$270.00
REDACTED		
11/7/2024	#1960 KLDISCOVERY Inv. 1001000051402 (Oct 2024)	\$270.00
11/20/2024	#1962 Cathy Provost, Court Reporter - Transcript Fleming 09/14/2024 Criminal Sentencing Hearing	\$101.00
11/20/2024	#1965 Barnwell Whaley, Mediation Services (Inv. 156034)	\$225.00
12/4/2024	#1971 KLDISCOVERY Inv. 1001000055406 (Nov 2024)	\$270.00
12/9/2024	Hampton County Probate Court - Certified Copies of Petition for PR of Westendorf and Order	\$26.95
1/5/2025	Case of Water for Trial per USDC	\$19.17
1/6/2025	Jimmy John's Lunch Day 1 of Trial	\$104.50
1/7/2025	#1988 Veritext - Deposition Transcripts Amy Miller and John Briggs (Invoice #7963045)	\$1,094.49
1/7/2025	Ted's Butcherblock Lunch Day 2 of Trial	\$125.11
1/7/2025	#1991 KLDISCOVERY Inv. 1001000060000 (Dec 2024)	\$270.00
1/8/2025	Five Loaves Lunch Day 3 of Trial	\$91.88
1/8/2025	#1995 Karen E. Martin, Ct. Rptr. - Rough Transcript Jury Selection, Day 1 of Trial Testimony (Inv. 2)	\$1,524.40

Total Costs:	\$5,237.50
Total Amount of this Bill:	\$176,249.50
Previous Balance:	\$0.00
Balance Due:	\$176,249.50

This invoice is due on 2/14/2025

TIMEKEEPER SUMMARY

Epting & Rannik, LLC

46A State Street,

Charleston, SC 29401-

Tel: 843-377-1871 Fax: 843-377-1310

ake@epting-law.com

Invoice Submitted To:

John Briggs
Nautilus Insurance Group
7233 East Butherus Drive
Scottsdale, AZ 85260

Invoice**Invoice Date:** Jan 15, 2025**Invoice Num:** 1690**Billing Through:** Jan 8, 2025**In Reference To:** Nautilus Insurance (2138-001:) - Managed by (JGR)**TIMEKEEPER SUMMARY**

Timekeeper	Total Hours	Hourly Rate
Andrew Epting	39.1	\$550.00
Angela Goddard Gross	0.4	\$150.00
Gwyn Martin	57.6	\$175.00
Jaan Rannik	471.2	\$285.00
Rhonda McCraw	29.0	\$175.00